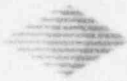


10CFR50.90



PECO ENERGY

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

January 27, 1995

Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

SUBJECT: Limerick Generating Station, Units 1 and 2
Technical Specifications Change Request No. 94-48-0
Eliminate Active Safety Function of Drywell Chilled Water
System Valves

Gentlemen:

PECO Energy Company is submitting Technical Specifications (TS) Change Request No. 94-48-0, in accordance with 10CFR50.90, requesting a change to the TS (i.e., Appendix A) of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2.

This TS Change Request will eliminate the TS active safety function designation of eight (i.e., four per unit) Drywell Chilled Water System (DCWS) valves.

Information supporting this TS Change Request is contained in Attachment 1 to this letter, and the proposed replacement pages for the LGS TS are contained in Attachment 2. The proposed changes are indicated by a vertical bar in the margin of the affected TS page. This TS Change Request is being submitted under affirmation, and the associated affidavit is enclosed.

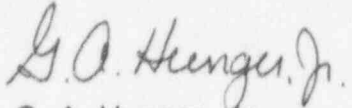
We request that, if approved, this TS Change Request for LGS, Units 1 and 2, be approved prior to July 31, 1995 and effective within 30 days of issuance.

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If you have any questions, please do not hesitate to contact us.

Very truly yours,



G. A. Hunger, Jr.,
Director - Licensing

Attachments
Enclosure

cc: T. T. Martin, Administrator, Region I, USNRC (w/attachments and enclosure)
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/attachments and enclosure)
R. R. Janati, PA Bureau of Radiological Protection (w/attachments and enclosure)

COMMONWEALTH OF PENNSYLVANIA

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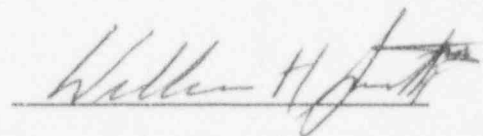
:

SS.

COUNTY OF CHESTER

:

W. H. Smith, III, being first duly sworn, deposes and says: That he is Vice President of PECO Energy Company, the Applicant herein; that he has read the enclosed Technical Specifications Change Request No. 94-48-0 "Eliminate Active Safety Function of Drywell Chilled Water System Valves," for Limerick Generating Station, Unit 1 and Unit 2, Facility Operating License Nos. NPF-39 and NPF-85, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

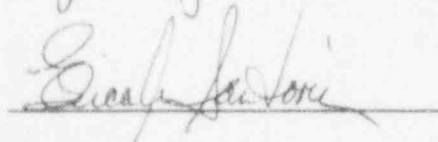


Vice President

Subscribed and sworn to

before me this 26th day

of January 1995.



Notary Public

Notary Seal
Erica A. Santon, Notary Public
Tracyville, Pa. - Chester County
My Commission Expires July 10, 1995

ATTACHMENT 1

LIMERICK GENERATING STATION
UNIT 1 AND UNIT 2

Docket Nos.

50-352

50-353

License Nos.

NPF-39

NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST

NO. 94-48-0

"Eliminate Active Safety Function of
Drywell Chilled Water System Valves"

Supporting Information for Changes - 3 PAGES

PECO Energy Company, licensee under Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, requests that the Technical Specifications (TS) contained in Appendix A to the Operating License be amended, as proposed herein, to eliminate the TS active safety function designation of eight (i.e., four on Unit 1, and four on Unit 2) Drywell Chilled Water System (DCWS) valves.

Discussion and Description of the Proposed Changes

This TS Change Request will change the TS active safety function designation of eight DCWS that will remain closed during all plant operational conditions (OPCONs) requiring Primary Containment isolation (i.e., OPCONs 1, 2, and 3). To assure these valves remain closed during OPCONs 1, 2, and 3, the valves' automatic isolation relays will be physically removed and the motor operated valves' (MOVs) circuit breakers will be locked open during OPCON 1, 2 and 3.

LGS Unit 1, TS Table 3.6.3-1 identifies valves HV-87-124A, HV-87-124B, HV-87-125A, and HV-87-125B as Primary Containment Isolation Valves (PCIVs). Similarly, LGS Unit 2, TS Table 3.6.3-1 identifies PCIV valves HV-87-224A, HV-87-224B, HV-87-225A, and HV-87-225B. These tables are proposed to be changed to eliminate the maximum isolation time and active safety function designations for the above listed valves.

Safety Assessment

The proposed changes will eliminate the DCWS MOVs active safety function to close; however, the changes will allow remote operation during plant OPCONs not requiring Primary Containment isolation (i.e., OPCONs 4 and 5). Effectively, the proposed changes will change each valve's designation from Q-active to Q-passive.

The LGS Updated Final Safety Analysis Report (UFSAR) Section 9.2.10.1.3 describes the DCWS as not having a safety related function, except for the system's Primary Containment penetrations and Primary Containment Isolation Valves (PCIVs). The subject DCWS MOVs function as containment isolation valves, and comprise the normally closed outboard influent and effluent isolation valves which can be aligned to the Reactor Enclosure Cooling Water (RECW) System as a non-safety related backup source of cooling water to DCWS.

Currently, a Primary Containment Isolation Signal will cause any open DCWS isolation valve to automatically close by de-energizing a normally energized PCIV relay. By de-energizing this relay the associated MOV "Close" electrical control circuit contacts will close and the valve will close if open.

The eight subject DCWS MOVs are normally closed and function in a passive safety mode during OPCONs 1, 2, and 3. The proposed changes will maintain this passive safety function and eliminate the active safety mode by prohibiting the valves from opening during OPCONs 1, 2, and 3. This will be accomplished by physical MOV electrical control circuit changes and administrative controls.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed changes to the Limerick Generating Station (LGS), Unit 1 and Unit 2, Technical Specifications (TS), which will change the TS active safety function designation of eight Drywell Chilled Water System (DCWS) valves, does not involve a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three (3) standards, set forth in 10 CFR 50.92 is provided below.

1. The proposed Technical Specifications changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes will eliminate the TS active safety function designation of eight (i.e., four per unit) DCWS valves. The DCWS motor operated valves (MOVs) are designated in TS as Primary Containment Isolation Valves (PCIVs), during operational conditions (OPCONs) 1, 2, and 3, which mitigate the consequences of design basis accidents. The proposed changes will prohibit the subject DCWS valves from opening during OPCONs 1, 2, and 3, thereby, eliminating the active safety function, and maintaining a passive safety function. The postulated accidents which require the Primary Containment to act as a barrier in order to mitigate the release of radioactivity, described in the LGS Updated Final Safety Analysis Review (UFSAR) Section 15, are not affected by these changes. Therefore, the previously evaluated postulated on-site and off-site radiological effects of these accidents will not change.

The DCWS valves will be prohibited from opening during OPCONs 1, 2, and 3 by physical changes made to the electrical control circuitry and administrative controls. Therefore, the probability of the valves to fail in the open position will diminish, and the required Primary Containment isolation safety function will be maintained.

Therefore, these proposed changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes remove the affected automatic isolation relays from the DCWS MOVs' circuitry. These changes eliminate any postulated relay failure effects on the associated control circuits and electrical power supplies. The proposed changes do not introduce any new accident initiators or any new valve failure modes not previously evaluated.

Therefore, these changes will not create the possibility of a new or different kind of accident from any accidents previously evaluated.

3. The proposed TS changes do not involve a significant reduction in a margin of safety.

The proposed changes will prohibit the opening of the DCWS valves which provide backup cooling from RECW during OPCIIONS 1, 2, and 3. The RECW System is not the normal DCWS cooling alignment, is not required as a backup safety related drywell cooling system, and this backup alignment is not an automatic function. The proposed changes do not affect the function or operation of DCWS, and since the proposed changes and administrative controls ensure the valves will remain closed during OPCIIONS 1, 2, and 3, the capability for Primary Containment isolation is not affected. Therefore, the changes will not involve a significant reduction in a margin of safety.

Information Supporting an Environmental Assessment

An Environmental Assessment is not required for the Technical Specifications changes proposed by this Change Request because the requested changes to the Limerick Generating Station, Units 1 and 2, TS conform to the criteria for "actions eligible for categorical exclusion," as specified in 10CFR51.22(c)(9). The requested changes will have no impact on the environment. The proposed TS changes do not involve a Significant Hazards Consideration as discussed in the preceding safety assessment section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluent that may be released offsite. In addition, the proposed TS changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications, and have concluded that they do not involve an unreviewed safety question.