



PECO ENERGY

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

December 21, 1994

Docket Nos. 50-353

License Nos. NPF-85

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

Subject: Limerick Generating Station, Unit 2
Response to Generic Letter 89-10, Supplement 6, "Information on
Schedule and Grouping, and Staff Response to Additional Public
Questions"

- References:
- 1) Letter from D. R. Helwig (PECO Energy Company) to NRC
dated December 28, 1989
 - 2) Letter from D. R. Helwig to NRC dated March 16, 1992
 - 3) Letter from G. A. Hunger, Jr. (PECO Energy Company) to
NRC dated April 14, 1994

Dear Sir:

NRC Generic Letter (GL) 89-10, Supplement 6, "Information on Schedule and Grouping, and Staff Responses to Additional Public Questions," states that if a licensee intends to extend its current schedular commitment for verifying the capability of motor operated valves (MOV's) within the scope of GL 89-10, the following information shall be submitted at least 60 days prior to the current commitment date, to assist the staff in evaluating the licensee's justification for extending the GL 89-10 test program for capability verification and establishing appropriate audit/inspection plans and schedules:

- (1) the completion status of the licensee's GL 89-10 program as of the current commitment date;

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- (2) for those MOVs whose capability will not be verified by dynamic testing by the current commitment date;
 - (a) for each valve: the valve type, size, safety function, design-basis differential pressure and flow, and the available valve factor (or similar capability measure), and a discussion of the relative risk significance of the valves involved;
 - (b) confirmation that the functionality of these MOVs has been established using the best available information; and
 - (c) the schedule for completing both the MOV testing and any needed corrective actions.

PECO Energy Company (PECO Energy) expects to have completed all of its MOV testing commitments and have all valves set up with the best available data, as documented in the referenced letters, by the end of the Limerick Generating Station (LGS), Unit 2 refueling outage 2R03. However, new data obtained from outage testing must be assessed and compared to the best available information used to set up the LGS Unit 2 MOVs to ensure that the most appropriate test data have been applied. Therefore, the purpose of this letter is to request a 90 day schedule extension beyond the originally committed completion date to perform this additional assessment/reconciliation.

We are providing the following information pursuant to GL 89-10, Supplement 6, to support our extension request:

- (1) The current schedule commitment for LGS Unit 2 is the end of the upcoming refueling outage 2R03, which is the third refueling outage since the issuance of GL 89-10. As indicated above, PECO Energy expects to have completed all of the actions in accordance with its commitments by the end of this outage, currently expected to be late February 1995.

Many individual tasks are required to complete PECO Energy commitments to confirm the capability of each of the MOVs in the LGS Unit 2 GL 89-10 Program by the end of 2R03. These activities include: static testing, revising switch settings, modifications, and dynamic testing, some of which will be done during power ascension at the end of the outage. In addition, efforts are underway to collect industry test information. In order to provide sufficient time for a thorough and accurate assessment of the results of these efforts, PECO Energy is hereby requesting a 90 day extension of the GL 89-10 Program for LGS Unit 2.

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- (2) As discussed below, all testing commitments and capability verifications are expected to be completed by the end of 2R03; therefore, the valve specific information, as addressed in GL 89-10 Supplement 6, Item 2, need not be submitted. Valves tested during the outage will have their operability confirmed and an assessment of their design basis capability performed prior to the end of the outage. Assessment/reconciliation of outage test results to other applicable valves may take up to 90 days beyond the completion of the outage. However, these other applicable valves will have been set up prior to the end of the refueling outage using assumed bounding design parameters established with the best available dynamic test data, and will be considered capable based on that data. Should any valve be found not capable as a result of the subsequent reconciliation, non-conformance reports will be initiated and appropriate actions taken.

If you have any questions or require additional information regarding this extension request, please contact us.

Sincerely,

G. A. Hunger, Jr.

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

Attachment: Affidavit

cc: T. T. Martin, Administrator, USNRC, Region I
N. S. Perry, Senior Resident Inspector, USNRC, LGS

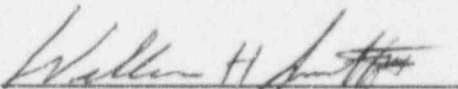
COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF CHESTER :

W. H. Smith, III, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company; that he has read the response to Generic Letter 89-10, Supplement 6, 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 21st day
of December 1994.


Notary Public

