

# PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

(215) 841-5001

January 19, 1984

Mr. A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docket Nos.: 50-352  
50-353

Subject: Limerick Generating Station, Units 1 and 2  
Procedures and Test Review Branch  
Procedures Generation Package

Reference: PECO and NRC Telecon dated 12/9/83.

File: GOVT 1-1 (NRC)

Dear Mr. Schwencer:

As discussed with the Procedures and Test Review Branch reviewer in the reference conference call, enclosed is the Limerick Generating Station (LGS) Procedures Generation Package as required by Supplement 1, Section 7 of NUREG-0737. The Procedures Generation Package enclosed consists of the following documents:

- 1) Administrative Procedure A-94, "Procedure for the Preparation and Control of Transient Response Implementation Plan (TRIP) Procedures". This administrative procedure incorporates both the Writer's Guide and verification and validation program requirements for Emergency Operating Procedures (EOP).
- 2) The Limerick specific TRIP Bases that were prepared in support of our Limerick TRIP Procedures and a description of three Limerick EPG calculations which have been adapted to the Limerick plant design. These two documents address the Plant Specific Technical Guideline requirement of NUREG-0737, Procedures Generation Package.
- 3) A description of our Transient Response Implementation Plan (TRIP) Training Program.

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The document which contains the Limerick TRIP bases contains information which Philadelphia Electric Company considers to be confidential and proprietary. Accordingly, it is hereby requested, pursuant to Section 2.790 of the Commission's Regulations, that the Limerick TRIP BASES be considered by the Commission as confidential and proprietary and be withheld from public disclosure. An affidavit setting forth the grounds in support of this request is attached hereto.

The above documents comprise the entire Procedures Generation Package as required by NUREG-0737 and consequently should satisfy confirmatory issue #62 of the LGS Safety Evaluation Report.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. G. Gentry".

cc: See Attached Service List

cc: Judge Lawrence Brenner	(w/enclosure)
Judge Peter A. Morris	(w/enclosure)
Judge Richard F. Cole	(w/enclosure)
Troy B. Conner, Jr., Esq.	(w/enclosure)
Ann P. Hodgdon, Esq.	(w/enclosure)
Mr. Frank R. Romano	(w/enclosure)
Mr. Robert L. Anthony	(w/enclosure)
Mr. Marvin I. Lewis	(w/enclosure)
Charles W. Elliot, Esq.	(w/enclosure)
Zori G. Ferkin, Esq.	(w/enclosure)
Mr. Thomas Gerusky	(w/enclosure)
Director, Penna. Emergency Management Agency	(w/enclosure)
Mr. Steven P. Hershey	(w/enclosure)
Angus Love, Esq.	(w/enclosure)
Mr. Joseph H. White, III	(w/enclosure)
David Wersen, Esq.	(w/enclosure)
Robert J. Sugarman, Esq.	(w/enclosure)
Spence W. Perry, Esq.	(w/enclosure)
Jay M. Gutierrez, Esq.	(w/enclosure)
Atomic Safety & Licensing Appeal Board	(w/enclosure)
Atomic Safety & Licensing Board Panel	(w/enclosure)
Docket & Service Section	(w/enclosure)
Martha W. Bush, Esq.	(w/enclosure)
James Wiggins	(w/enclosure)

Note: Document entitled "Limerick Generating Station  
TRIP BASES" provided only to Addressee.

Commonwealth of Pennsylvania:

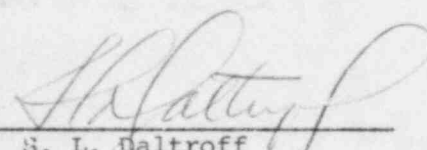
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County of Philadelphia:

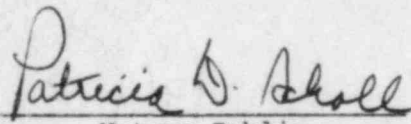
I, S. L. Daltroff, being duly sworn according to law depose and state that I am Vice President, Electric Production Department, of Philadelphia Electric Company (PECO) and am authorized to execute this affidavit, and that:

1. For the reasons listed below, the document entitled "Limerick Generating Station TRIP Bases" which is being filed with the United States Nuclear Regulatory Commission in connection with its License Application Docket Nos. 50-352 and 50-353, contains information considered by PECO to be confidential and proprietary.
2. The Limerick TRIP Bases contains Limerick specific information, procedural-type calculational explanations and TRIP procedure flow chart methodology developed by PECO at a substantial expense and effort to PECO. It is estimated that a total of approximately \$1,100,000.00 has been spent on developing the flow chart methodology, calculational explanations, and flow charts and on use charges for the control room simulator.
3. The information contained in the TRIP Bases has been and will continue to be held in confidence by PECO. External distribution of this information is restricted with the exception of the BWR Owners Group. The information is provided to the BWR Owners Group with limitations on its duplication, use and disclosure.
4. The information contained in the TRIP Bases is not available from public sources.

5. Because of the time and expense incurred in the development of the Limerick specific information, generation of calculational explanations and development of the flow chart methodology, and the anticipated adverse impact on PECO of making this information available to the public, without charge, the need for protecting PECO's investment should outweigh the interest involved in public disclosure of this information.

  
S. L. Daltroff

subscribed and sworn to  
before me this 19th  
day of JANUARY, 1984

  
Notary Public

PATRICIA D. SCHOLL  
Notary Public, Philadelphia, Philadelphia Co.  
My Commission Expires February 10, 1986