



**PECO ENERGY**

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

May 4, 1995

Docket Nos. 50-277  
50-278  
50-352  
50-353

License Nos. DPR-44  
DPR-56  
NPF-39  
NPF-85

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

Subject: Peach Bottom Atomic Power Station, Units 2 and 3  
Limerick Generating Station, Units 1 and 2  
Implementation of Emergency Action Levels  
Developed from NUMARC/NESP-007 Methodology

Gentlemen:

Enclosed for your review and approval is PECO Energy Company's Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, and Limerick Generating Station (LGS), Units 1 and 2, Emergency Action Levels (EALs) and Technical Basis Manuals which are based on the methodology outlined in NUMARC/NESP-007, "Methodology for Development of Emergency Action Levels."

The EALs have been reviewed by the PBAPS and LGS Plant Operations Review Committees (PORCs), as required by 10CFR50.54(q), and were determined not to decrease the effectiveness of the Nuclear Emergency Plan (EP). However, due to the NRC's endorsement of NUMARC/NESP-007 as documented in Revision 3 to Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Plants," dated August 1992, we are requesting prior NRC approval for implementation of the EALs at PBAPS and LGS.

In order to support the NRC's review of the Technical Basis Manuals, the following information is enclosed.

- o Enclosure 1
  - PBAPS Upgraded EAL Technical Basis Manual.
  - PBAPS EAL Table.
  - PBAPS Upgraded EAL NUMARC Comparison.

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o Enclosure 2

- LGS Upgraded EAL Technical Basis Manual.
- LGS EAL Table.
- LGS Upgraded EAL NUMARC Comparison.

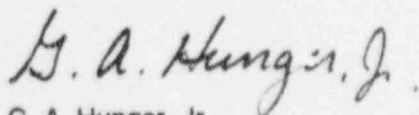
The enclosed EAL Technical Basis Manuals and supporting documentation have been reviewed with the States and counties within the Emergency Planning Zones (EPZs) for PBAPS and LGS. These EALs will not be implemented until completion of the NRC's review and approval, and until initial training is completed.

Changes to the Nuclear EP resulting from implementation of revised EALs will be performed in accordance with the requirements of 10 CFR 50.54(q).

We are requesting that the NRC review and approve the EAL Technical Basis Manuals for PBAPS, Units 2 and 3, and LGS, Units 1 and 2, which incorporate the NUMARC/NESP-007 guidelines by October 31, 1995, in order to facilitate training of the appropriate Emergency Response Organization (ERO) personnel by the end of March 1996.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,



G. A. Hunger, Jr.  
Director - Licensing

Enclosures

cc: T. T. Martin, Administrator, Region I, USNRC (w/ enclosures)  
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/ enclosures)  
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS (w/ enclosures)

**ENCLOSURE 1**

**PEACH BOTTOM ATOMIC POWER STATION  
UNITS 2 AND 3**

**EMERGENCY ACTION LEVEL  
SUPPORTING DOCUMENTATION**