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May 16, 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&2
Information for Auxiliary Systems Branch
(ASB) on Instrument Air Cleanliness

References: Telecon between J. Ridgely (NRC/ASB)
and J. H. Arhar, D. R. Helwig (PECO) on
May 8, 1984.

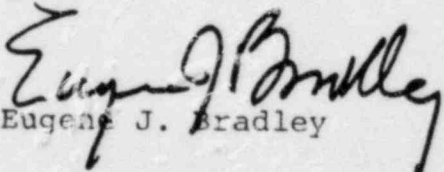
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Dear Mr. Schwencer:

Attached are draft changes to our response to NRC
RAI-410.73 which are being made as a result of the
referenced telecon.

The information contained on these draft FSAR changes
will be incorporated into the FSAR, exactly as it appears
on the attachments, in the revision scheduled for June 1984.

Sincerely,


Eugene J. Bradley

JHA/gra/050984240

Attachment

Cc: See Attached Service List

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PDR ADDCK 05000352
A PDR

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QUESTION 410.73 (Section 9.3.1)

- (a) Verify that every instrument air system meets the requirements of ANSI MC11.1-1976. For each requirement not currently met, justify the deviation or provide a discussion of design changes which will bring each system into full compliance with ANSI MC11.1-1976 requirements.
- (b) Verify that all instrument air compressors are non-oil lubricated (dry).
- (c) Verify conformance with the guidelines of Regulatory Guide 1.68.3 "Preoperational Testing of Instrument Air Systems," for each instrument air system.

RESPONSE

(i.e., PARTICLES GREATER THAN 50 MICRONS)

- (a) The instrument air system and the primary containment instrument gas system meet the requirements of ANSI MC11.1-1976 with the exception that allowable particulate size has been determined based on equipment supplier recommendations and engineering analysis. Most safety-related instrument air or gas users have been verified to be provided with an appropriately sized local, in-line filter connected to the user with copper or stainless steel tubing. Particulate limits for safety-related components not provided with individual filters (MSIVs, ADS SRVs, CRD HCUs) have been investigated. After consultation with the equipment suppliers and review of applicable operating experiences, it has been determined that a limit of no visible particulate will ensure long-term reliable operation of each component. Documentation confirming this assessment has been obtained from the equipment suppliers. Although visible particulate is greater than 20 micron, a measured value of less than 20 microns will be verified to exist at the following locations during an air blow of at least one hour duration:

- (1) Each MSIV operator manifold (8 total)
- (2) Each ADS SRV operator (5 total)
- (3) Each CRD HCU air supply header (4 total)

- (b) The instrument air system and primary containment instrument gas system use non-oil lubricated air compressors.
- (c) The safety-related portions of the instrument air system and primary containment instrument gas system are tested in accordance with Regulatory Guide 1.68.3, as stated in Section 14.2. Compliance to Regulatory Guide Position C.11. is demonstrated by the following program:

- (1) Verification that the specific type or model of safety-related solenoid valves and pneumatic valve actuators (Table 9.3-4) have been tested by the equipment suppliers for the maximum supply system pressure resulting from credible system failures.
- (2) For safety-related equipment that has not been tested by the equipment supplier, the equipment will be tested onsite at the maximum supply system pressure resulting from credible system failures to ensure that there will be no loss of operability.
- (3) Safety-related equipment that has been tested by the equipment supplier, but a) are rated below the maximum credible supply system pressure and/or b) fails the test in (2) above will be replaced by equipment with a higher service pressure rating or will be provided with appropriate overpressure protection devices.