

**PECO ENERGY**

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

June 5, 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. 94-49-0

Gentlemen:

PECO Energy Company is submitting Technical Specifications (TS) Change Request No. 94-49-0, in accordance with 10CFR 50.90, requesting an amendment to the TS (Appendix A) of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively. This proposed change will revise TS Section 3/4.1.5, "Standby Liquid Control System," (SLCS), to remove the minimum flow rate requirement for the SLCS pumps from Technical Specifications Section 3/4.1.5. Information supporting this Change Request is contained in Attachment 1 to this letter, and the proposed replacement pages for the LGS Units 1 and 2 TS are contained in Attachment 2. This information is being submitted under affirmation, and the required affidavit is enclosed.

We request that, if approved, the amendment to the LGS Units 1 and 2 TS be issued by April 1, 1996, and become effective within 30 days of issuance.

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

Very truly yours,

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

Enclosure, Attachments

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

9506090124 950605
PDR ADOCK 05000352
P PDR

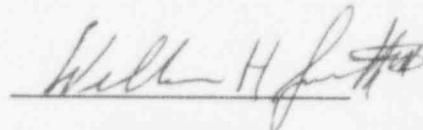
COMMONWEALTH OF PENNSYLVANIA

SS.

COUNTY OF CHESTER

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

That he is Vice President of PECO Energy Company, the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating License Nos. NPF-39 and NPF-85 (Technical Specifications Change Request No. 94-49-0), to remove the minimum flow rate requirement for the Standby Liquid Control System pumps from Technical Specifications Section 3/4.1.5, at Limerick Generating Station, Units 1 and 2, 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.

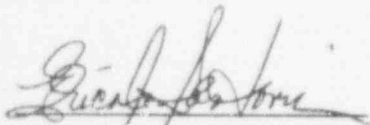


Vice President

Subscribed and sworn to

before me this 5th day

of June 1995.



Notary Public

Notarial Seal
Erica A. Santon, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires July 10, 1995

ATTACHMENT 1

LIMERICK GENERATING STATION

UNITS 1 AND 2

DOCKET NOS. 50-352
50-353

LICENSE NOS. NPF-39
NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST

NO. 94-49-0

"DELETE STANDBY LIQUID CONTROL SYSTEM (SLCS) PUMP MINIMUM
FLOW REQUIREMENTS FROM TECHNICAL SPECIFICATIONS SECTION 3/4.1.5"

Supporting Information for Changes - 3 Pages

PECO Energy Company, under Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively, requests that the Technical Specifications (TS) contained in Appendix A to the Operating License be amended as proposed herein, to revise TS Section 3/4.1.5 and TS Bases 3/4.1.5 in order to remove the minimum flow rate requirement for the Standby Liquid Control System (SLCS) pumps from the TS. The proposed change to the TS is indicated by a vertical bar in the margin of TS page 3/4 1-20 and TS Bases page B 3/4 1-4 for Units 1 and 2. The TS pages and TS Bases pages showing the proposed change are contained in Attachment 2.

We request that, if approved, the TS change proposed herein be issued by April 1, 1996, and become effective within 30 days of issuance of the amendment.

This TS Change Request provides a discussion and description of the proposed TS change, a safety assessment of the proposed TS change, information supporting a finding of No Significant Hazards Consideration and information supporting an Environmental Assessment.

Discussion and Description of the Proposed Change

The proposed Technical Specifications (TS) Change Request involves the change of Limerick Generating Station (LGS), Units 1 and 2, TS Section 3/4.1.5 and TS Bases 3/4.1.5, to remove the minimum flow rate requirement for the Standby Liquid Control System (SLCS) pumps from the TS. The surveillance requirement which specifies that the SLCS pumps are tested for a minimum flow rate of 41.2 gpm is being removed from the TS, since all flow rate considerations are encompassed by the Anticipated Transient Without Scram (ATWS) equation included in the same TS.

The SLCS is designed to provide backup capability for bringing the reactor from full power to a cold, Xenon-free shutdown condition in the event that the control rod drive system fails. In the event of an ATWS, the SLCS will be initiated automatically from the Redundant Reactivity Control System (RRCS) logic. If the SLCS is needed for a non-ATWS event, operation is manually initiated. In order to stop the reaction, the SLCS pumps a sodium pentaborate solution into the reactor core to reach a minimum concentration of 360 ppm. The ATWS equation described in LGS Units 1 and 2 TS encompasses the equivalent sodium pentaborate concentration, Boron-10 enrichment, and minimum SLCS pump flow rate to ensure that the necessary borated solution concentration is established in the reactor within the required time. Therefore, any additional flow rate requirement (i.e., 41.2 gpm), is not necessary for TS Section 3/4.1.5 and its associated Basis.

The SLCS pumps will continue to be tested periodically for operability, in accordance with TS 4.0.5 Surveillance Requirements for American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B & PV) Code, Class 2 components (i.e., safety-related pumps), and the testing frequency remains unchanged.

Therefore, we propose that TS Section 3/4.1.5 and TS Bases 3/4.1.5 be revised to remove the minimum flow rate requirement for the SLCS pumps.

Safety Assessment

The proposed TS change will remove the minimum flow rate requirement for the Standby Liquid Control System (SLCS) pumps (i.e., 41.2 gpm) from TS Section 3/4.1.5, since all flow rate considerations are encompassed by the Anticipated Transient Without Scram (ATWS) equation included in the same TS Section. The SLCS pumps, which are safety-related, are not physically modified by the proposed TS change. They will continue to be tested for operability, in accordance with TS 4.0.5 Surveillance Requirements for American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B & PV) Code Class 2 pumps, and the testing frequency remains unchanged. SLCS pump testing will ensure that the pumps perform in accordance with the existing design basis for the SLCS. The proposed TS change does not impact the operation of the SLCS system.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed change to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS) which will revise TS Section 3/4.1.5, "Standby Liquid Control System," and its associated TS Basis to remove the minimum flow rate requirement for the SLCS pumps from TS, 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 (TS) change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed TS change will remove the minimum flow rate requirement for the Standby Liquid Control System (SLCS) pumps from Technical Specifications Section 3/4.1.5. The proposed TS change does not involve any physical change in the plant configuration or the SLCS pumps operation. The SLCS is not used during normal plant operation; therefore, there is no impact on any accident initiators. The proposed TS change does not change the plant response to transients in any way that could increase the likelihood of an accident. The consequences of previously evaluated accidents are not affected since the SLCS pumps and the balance of the SLCS will continue to perform as designed, in accordance with the Anticipated Transient Without Scram (ATWS) Rule specified in 10CFR50.62. The SLCS pumps will continue to be tested periodically for operability in accordance with TS 4.0.5 Surveillance Requirements for American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B & PV) Code Class 2 pumps, and the testing frequency remains unchanged.

Therefore, the proposed TS change does not involve an increase in the probability or consequences of an accident previously evaluated.

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

The proposed TS change will remove the minimum flow rate requirement for the Standby Liquid Control System (SLCS) pumps from Technical Specifications Section 3/4.1.5. The SLCS and the SLCS pumps will continue to function as currently designed. There are no physical changes being performed to the SLCS or plant configuration. The proposed TS change does not introduce a new failure mode for the SLCS pumps. Physical and electrical redundancy and

separation criteria are not impacted by this proposed TS change. There is no change to the Redundant Reactivity Control System (RRCS) logic which could create an accident or transient of a different type.

Therefore, the proposed TS change does not create the possibility of a new or different kind of accident, from any accident previously evaluated.

3. The proposed TS change does not involve a significant reduction in a margin of safety.

The following TS Bases were reviewed for potential reduction in the margin of safety:

3/4.1.5 Standby Liquid Control System

4.0.5 Surveillance Requirements

The margin of safety as defined in the TS Bases will remain the same. The specific flow rate requirement for the Standby Liquid Control System (SLCS) pumps is being removed from the TS since the Anticipated Transient Without Scram (ATWS) equation ensures acceptable flow rates. The SLCS pumps, which are safety-related, are not physically modified or impacted by the proposed TS change. The pumps will continue to be tested for operability, in accordance with TS 4.0.5 Surveillance Requirements for ASME B & PV Code Class 2 pumps, and the testing frequency remains unchanged. This testing will ensure that the SLCS pumps operate in accordance with the existing design basis for the SLCS.

Therefore, the proposed TS change does not involve a reduction in a margin of safety.

Information Supporting an Environmental Assessment

An environmental assessment is not required for the change proposed by this TS Change Request because the requested change to the Limerick Generating Station (LGS), Units 1 and 2, TS conforms to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR51.22(c)(9). The requested change will have no impact on the environment. The proposed change does not involve a significant hazards consideration as discussed in the preceding section. The proposed change does not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the proposed change does 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 this proposed change to the Limerick Generating Station (LGS), Units 1 and 2, TS and have concluded that it does not involve an unreviewed safety question, and will not endanger the health and safety of the public.