

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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NUCLEAR ENGINEERING & SERVICES DEPARTMENT

January 23, 1992

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  
NRC Safety Evaluation Report Discrepancy

Gentlemen:

This letter is being submitted to inform the NRC of a discrepancy in its Safety Evaluation Report (SER) for Limerick Generating Station, Units 1 and 2 (i.e., NUREG-0991, "Safety Evaluation Report Related to the Operation of Limerick Generating Station, Units 1 and 2," dated August 1983) regarding the seismic category classification of the new fuel inspection stand.

Specifically, Section 9.1.4 (page 9-9) of the NRC SER states that the new fuel inspection stand at LGS is designed to meet seismic Category I requirements. However, Table 3.2-1 and Table 9.1-7 of the LGS Final Safety Analysis Report (FSAR) and Updated Final Safety Analysis Report (UFSAR) state that the new fuel inspection stand is classified as seismic Category II (i.e., non-seismic) and therefore, is not designed to maintain its structural integrity during or after a Safe Shutdown Earthquake (SSE). In addition, there are no regulatory requirements stipulating that the new fuel inspection stand needs to meet the design requirements of a seismic Category I structure. Accordingly, we consider that the correct classification of the new fuel inspection stand is non-seismic.

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

Very truly yours,



G. J. Beck  
Manager  
Licensing Section

cc: T. T. Martin, Administrator, Region I, USNRC  
T. J. Kenny, USNRC Senior Resident Inspector, LGS