

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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NUCLEAR ENGINEERING & SERVICES DEPARTMENT

February 11, 1992

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
Conversion to 24 Month Refueling Cycles

Gentlemen:

Philadelphia Electric Company (PECo), because of the economic benefits associated with a longer fuel cycle, is in the process of changing the operation of each of Limerick Generating Station (LGS), Units 1 and 2, and Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, from the current 18 month refueling cycle to a 24 month refueling cycle. Implementation of this change involves loading improved reactor fuel into each of the four nuclear units, which began with LGS Unit 2 in the Spring of 1991 and will be completed with PBAPS Unit 2 in the fall of 1992. In order to accommodate a 24-month refueling cycle at LGS and PBAPS, PECo is preparing submittals to request changes to the Technical Specifications (TS) required surveillance intervals from 18 months to 24 months in accordance with the guidance in NRC Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991.

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Based on our evaluation of the TS, we have formed three "groupings" of TS surveillances requiring a change to implement a 24 month refueling cycle. Three TS change request submittals will be prepared based on the three groups. Group 1 TS surveillances are the highest priority and require a TS change to eliminate the performance of these TS surveillances during a mid-cycle unit outage. For example, this group includes any TS surveillances requiring an open reactor vessel or those which are supported by equipment refurbishment turnaround times which cannot be met during a mid-cycle unit outage. Group 2 TS surveillances are all other TS surveillances except those related to instrumentation. Within this overall group, TS are combined together into smaller groups due to a common element of the TS line items. For example, all pump, valve, and flow testing surveillances are grouped together. Group 3 includes instrumentation TS surveillances. These surveillances are grouped together because of the specific guidance provided in GL 91-04 with regard to the evaluations necessary to support instrumentation surveillance changes. For your information, below is a listing of the expected TS change request submittal dates for both LGS and PBAPS:

April 1992 - Group 1,
June 1992 - Group 2, and
July 1992 - Group 3.

In addition, PECO will submit any other types of requests (e.g., exemption requests), determined necessary from our continued review and evaluation during this refueling cycle change process, on an as needed basis.

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

Very truly yours,



Manager
Licensing Section

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