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OCT 12 1984

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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
Additional Information for Power Systems Branch (PSB)
Regarding Turbine System Inspection and Maintenance
Program (Draft License Condition No. 13)

Reference: Telecon between E. Tomlinson (NRC/PSB) and
J. Arhar/D. DiPaolo (PECO), 10/10/84.

File: GOVT 1-1 (NRC)

Dear Mr. Schwencer:

Pursuant to the reference telecon, this letter provides justification for observing valve motion by position indication in lieu of direct observation during turbine system inservice inspection (ISI).

In accordance with FSAR Section 10.2.3.6 commitments, the following valves are frequently exercised during normal operation as part of the subject ISI program: main steam stop valves, main steam control valves, combined intermediate valves (CIV's), and power-assisted extraction check valves. As shown on FSAR Figures 12.3-10 and 12.3-11, these valves are located in plant radiation zone 5 where the maximum design dose rate is greater than 100 mrem per hour. Because this is a high radiation zone, ALARA concerns dictate the need for minimizing personnel access into the areas where the valves are located. Therefore, remote observation of the cycling behavior of these valves is conducted in lieu of direct observation.

The subject valves are provided with reliable position indication. The main steam stop and control valves and the CIV's are equipped with 100% position indication in the control room. The operator will cycle each valve from the control room and verify that the valve moves smoothly from its fully open position to a fully closed position by observing the position indicator. FSAR Figure 10.2-3 (sheets 5 and 6) provides a schematic of the position indication

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transmitter for these valves. The power-assisted extraction check valves are provided with position indicating lights in the control room. The operator exercises each valve from the control room and verifies that the valve has left its fully open position by observing the indicating lights.

We trust that this additional information satisfies your concerns.

Sincerely,

V. S. Boyer
for J.S.H.

JHA/mlb/10118401

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