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PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4502

SEP 07 1984

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

Mr. Richard W. Starostecki
Director, Division of Project and
Resident Programs, Region I
United States Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Subject: Limerick Generating Station, Unit 1
Resolution of Open Items

File: GOVT 1-1

Dear Mr. Starostecki:

The following information is submitted to close the Unresolved
Items from the exit meeting held on August 6, 1984 for NRC Inspection
#84-42 - SIT & ILRT.

NRC Item No.

Subject/Resolution

84-42*

Disposition of packing leaks on HV-57-103, 113,
122, 125:

During the performance of the ILRT, packing
leaks in these valves were sealed by injecting
a temporary sealant material into their packing
glands. A permanent, testable fix has been
developed and will be implemented prior to fuel
load (see FCR-A40572). This item will be
resolved upon completion of this work.

84-42*

Programs for monitoring "as found" leakage and
assessing ILRT during operation:

Our review of NRC requirements and LGS commitments
regarding integrated and local leak rate tests has
not uncovered a requirement for monitoring "as
found" leakage. We believe that a draft revision
to 10CFR50, Appendix J recently transmitted to
ACRS for review incorporates a requirement for "as
found" leakage monitoring (reference G. A. Arlotto,
NRC, to R. F. Fraley, ACRS, dated May 18, 1984).

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The BWR Owner's Group has been studying this issue and has filed comments with the NRC staff (reference BWROG letter to D. G. Eisenhut, NRC, dated March 4, 1983). PECO has also submitted its comments (reference V. S. Boyer, PECO, letter to E. A. Arlotto, NRC, dated July 6, 1984).

We believe that the current rulemaking should be concluded prior to a conclusion that "as found" leakage should be monitored at Limerick.

In the interim, we plan to implement the following program:

- 1) Report pre- and post-repair leak rate test results in accordance with ANSI/ANS 56.8-1981 Paragraph 3.2.6, and
- 2) adjust ILRT test results to account for "required local leakage rate additions" as defined in ANSI/ANS 56.8-1981 Paragraphs 3.2.1.4 and 3.2.1.5, and
- 3) retain "backup data" regarding local leak rate tests in accordance with ANSI/ANS 56.8 Paragraph 5.8.8(i).

Please advise us if a meeting is needed to discuss these items.

* NRC Inspection Report not yet received.

Sincerely,

JW Sullivan
for
JS Kanger

DRH/cmv/08308403
Attachments (3)
Copy to: S. Chaudhary
Resident NRC Inspector