



PECO NUCLEAR

A UNIT OF PECO ENERGY

Station Support Department

10 CFR 50.54(f)

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

April 18, 1996

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,
Generic Letter 96-01, "Testing of Safety-Related
Logic Circuits"

Dear Sirs:

Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits", dated January 10, 1996, requested licensees to provide a written response within 60 days of the date of the GL, indicating whether or not the licensee will implement the requested actions. The industry, through the Nuclear Energy Institute (NEI), requested clarification regarding the actions, and requested a meeting with the NRC on these issues. The NRC recognized that additional clarification was appropriate, and agreed to attend an NEI sponsored workshop. In addition, the NRC extended the submittal date until 30 days after the workshop was held. The workshop was held on March 19, 1996. PECO Energy participated in the workshop, and appreciated the opportunity to discuss the GL with the NRC. The NRC's response to the industry's request for clarification is documented in a March 27, 1996 letter from Bruce A. Boger, USNRC to Alexander Marion, NEI.

At the workshop, PECO Energy gained an understanding of the scope of testing that is to be addressed by the GL. With this understanding, PECO Energy has defined the scope of GL 96-01 as Technical Specifications (TS) required surveillance procedures for systems that are required for either accident mitigation or whose failure will affect accident mitigation.

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Having defined the scope, PECO Energy will ensure that these surveillance procedures adequately test safety-related automatic actuation logic circuitry so that a failure of an essential electric component (e.g., relay, contact) will not be undetected for an extended period of time. Generally, these surveillance requirements are completed by a Logic System Functional Test (LSFT); however, PECO Energy will include other tests, such as channel functional tests, that are intended to verify operability of equipment within the scope of GL 96-01.

ACTION PLAN

A thorough review of the licensing bases of PBAPS and LGS will be completed to identify those systems, structures and components that satisfy the scope of GL 96-01.

For PBAPS, in response to Information Notice (IN) 88-83, a systematic review of LSFT required by the Technical Specifications (TS) then in effect, was performed. In the early 1990's, PBAPS completed a program to review and re-write all surveillance test (STs) required by those TS. During these reviews, special emphasis was placed on LSFT, with the intent that the new STs adequately test all of the electrical devices within a logic system. Based on these reviews, we believe PBAPS has satisfied the requested actions for the majority of the systems within the scope of GL 96-01; however, these reviews were based on the custom TS that PBAPS has since replaced with Improved Technical Specifications (ITS). To verify that these reviews were maintained through procedure revisions and that logic testing for systems included in ITS is adequate, a review of one logic division of each of the systems within the scope of GL 96-01 will be completed. Where there are differences between the logic divisions in a system, a review will be completed to ensure that these differences are adequately tested.

For LGS, during ST initial development a thorough methodology was employed to ensure all components were tested. To verify that the original methodology was maintained through procedure revisions, a review of one logic channel of each of the systems within the scope of GL 96-01 will be completed. Where there are differences between the logic channels in a system, a review will be completed to ensure that these differences are adequately tested.

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Schedule

The GL requests that actions be accomplished prior to startup from the first refueling outage commencing one year after the issuance of this generic letter. Accordingly, these actions will be completed prior to startup from the PBAPS Unit 2 refueling outage, Fall of 1998 (2R12), and the PBAPS Unit 3 refueling outage, Fall of 1997 (3R11), and prior to startup from the LGS Unit 1 refueling outage, Spring of 1998 (1R07), and the LGS Unit 2 refueling outage, Spring of 1997 (2R04).

Very truly yours,

M. C. Kray for

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

Attachment

cc: T. T. Martin, Administrator, Region 1, USNRC
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS
N. S. Perry, USNRC Senior Resident Inspector, LGS

COMMONWEALTH OF PENNSYLVANIA :

: SS

COUNTY OF CHESTER :

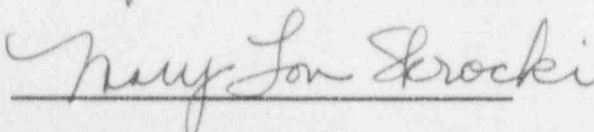
D. B. Feters, being first duly sworn, deposes and says:

That he Is Vice President of PECO Energy Company; that he has read the attached response to the Generic Letter 96-01 for Peach Bottom Facility Operating Licenses DPR-44 and DPR-56, and Limerick Facility Operating Licenses NPF-39 and NPF-85, 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 18th day
of April 1996.



Notary Public

