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May 29, 1985

Docket Nos. 50-352
50-353

Mr. A. Schwencer, Chief
Operating Reactors Branch #2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Limerick Generation Station - Units 1 and 2
Generic Letter 83-28 "Required Action Based on
Generic Implications of Salem ATWS Events"

REFERENCE: Letter, A Schwencer, USNRC, to
E. G. Bauer, Jr. PECO., March 19, 1985

Dear Mr. Schwencer:

The reference letter forwarded the NRC assessment of the completeness and adequacy of our responses to the subject Generic Letter for Limerick Units 1 and 2.

The results of the NRC review are as restated below along with our response.

Item 2.1 (Part 1) - Incomplete:

Licensee needs to verify that safety related RTS components are designated as such on all drawings, documents, and in information handling systems.

RESPONSE:

All systems that contribute to the reactor trip function have been identified as being in the current 'Q' list. Consequently, all components on the identified systems, unless specifically excluded by a unique safety evaluation, are subject to the quality assurance program.

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In accordance with approved Limerick Administrative Procedures and Engineering and Research Departmental Procedures regarding procurement, each item or service to be procured must be reviewed to determine whether or not it is safety related. This review is performed by a cognizant member of the Plant Staff or the Engineering and Research Department as applicable. The determination is guided by the 'Q'-list, applicable codes and standards, the Final Safety Analysis Report and information from the Architect Engineer and the NSSS supplier.

Philadelphia Electric Company believes the current Limerick 'Q' list and the existing procedural controls governing its use are adequate to meet the intent of Generic Letter 83-28.

Item 2.1 (part 2) Incomplete

Licensee needs to submit a description of a program to establish and maintain an interface between all vendors of safety-related RTS components and the licensee. Information submitted shall describe how the program assures that vendor technical information is kept current, complete and controlled throughout the plant life and how the program will be implemented at Limerick 1 and 2.

RESPONSE:

Philadelphia Electric Company has implemented the program for control of RTS manuals as described in letter V. S. Boyer PECO to D. G. Eisenhower USNRC, dated May 8, 1984, utilizing independent review of NSSS vendor technical reporting methods by the Independent Safety Engineering Group (ISEG). Certain elements of the procedures placed in effect by Philadelphia Electric Company referred to in response to the INPO-NUTAC (item 2.2.2 of this letter) specify the administrative controls and implementing procedures utilized to maintain RTS manuals up to date.

The program for Limerick Units 1 and 2 is identical to the program established for Philadelphia Electric Company's Peach Bottom Atomic Power Station Units 2 and 3 in response to the Generic Letter.

Item 2.2.1 - Incomplete

The licensee needs to respond to sub-item 6 regarding classification of equipment important to safety.

RESPONSE:

Item 2.2 of the Generic Letter requires licensees and applicants to submit for staff review, a description of the program for safety related equipment classification and vendor interface as described in paragraphs 2.2.1.1 through 2.2.1.5.

Sub-item 6 specifies that "Licensees and applicants need only to submit for staff review the equipment classification program for safety related components." Classification programs for components important to safety were not required to be submitted for staff review.

It is our understanding that only classification programs for safety-related equipment require a response for NRC staff review for Generic Letter 83-28.

Item 2.2.2 - Incomplete

Licensee needs to describe their program for establishing and maintaining an interface with all vendors of safety-related equipment that assures that vendor technical information is kept current, complete, and controlled over the life of the plant. If the licensee plans to implement the recommendations of NUTAC, they should note that the staff found the NUTAC program fails to address the establishment and maintenance of an interface between licensee and all vendors of safety-related equipment and act to provide the needed information. Where maintenance or test work is performed by other than licensee personnel, the division of responsibility between licensee and vendor for control of procedures and maintenance instructions shall be described.

RESPONSE:

During Philadelphia Electric Company's participation in the INPO NUTAC program, we evaluated the merits of the program in addressing the NRC position contained in item 2.2.2 of the Generic Letter. Although there is little incentive for equipment manufacturers to be cognizant of equipment maintenance histories and failures, there is high incentive for utilities to maintain the type of information exchange described within the Vendor Equipment Technical Information Program (VETIP) as defined in the March 1984 NUTAC Report for both plant safety and reliability considerations.

Philadelphia Electric Company has implemented the program described in the Vendor Equipment Technical Information Program as committed in letter S. L. Daltroff, PECO., to D. G. Eisenhut, USNRC, dated April 23, 1984 by issuance of the following administrative and implementing procedures:

- LS-A-1 Administrative Procedure for Review, Disposition and Monitoring of Responses to NRC IE Bulletins, IE Information Notices, and Division of Licensing Generic Letters
- LS-A-2 Administrative Procedure for Participation in Nuclear Plant Reliability Data System
- LS-I-5 Implementing Procedure for Utilization of the INPO NPRD System
- LS-I- Implementing Procedure for Review, Disposition and Monitoring Nuclear Regulatory Commission IE Bulletins, IE Information Notices and Division of Licensing Generic Letters
- NS-A-5 Administrative Procedure for Review and Implementation of Operating Experience Information for Vendor Manual Maintenance

In addition to the above listed procedures, the following existing procedures, which have been prepared as a result of Generic Letter 83-28, are applicable to Items 1, 3, and 4 of the NUTAC Program:

- NSS-I-4 Procedure for Review and Utilization of Operating Experience Information
- NSS-I-5 Procedure Governing the Use of the Institute of Nuclear Power Operations Nuclear Network
- ERDP 6.4 Procedure for Control of Vendor Technical Manuals

The requirements for Controls for vendor services which are safety-related contained in the NUTAC program are specified in A-27.3 Administrative Procedure for the Procurement of Safety Related Services for Limerick.

Based on the program developed by Philadelphia Electric Company in accordance with the NUTAC-VETIP program, it is requested that NRC re-evaluate this program as a valid response to item 2.2.2 of the Generic Letter.

Items 3.1.3 and 3.2.3 - Incomplete

Licensee needs to state if they have found any post-maintenance testing requirements for either RTS components or other safety-related equipment that may degrade safety. If any such are identified, the licensee shall describe actions to be taken including submitting needed Technical Specification changes.

RESPONSE:

During the preparation of the Limerick Technical specifications, no post-maintenance testing requirements were identified that may degrade safety.

Item 4.5.3 - Incomplete

Licensee needs to present the results of their study of existing or proposed intervals for on-line testing of the reactor trip system. Such studies shall consider each of the concerns expressed in sub-items 4.5.3.1 through 4.5.3.5. of the generic letter, show how the intervals result in high reactor trip system availability, and presents any resulting Technical Specification changes for staff review.

The staff finds that modifications are not required to permit on-line testing of the backup scram valves. However, the staff concludes that testing of the backup scram valves (including initiating circuitry) at a refueling outage frequency, in lieu of on-line testing, is appropriate and should be included in the technical specifications surveillance requirements. The licensee needs to address this conclusion.

RESPONSE:

Philadelphia Electric Company participated in the BWR Owners Group effort to address the review of existing technical specification intervals for testing reactor trip system components. By way of this letter, Philadelphia Electric Company endorses the "BWR Owners Group Response to NRC Generic Letter 83-28, Item 4.5.3" (NEDC-30844) for Limerick Units 1 and 2. This report was transmitted for NRC staff review on January 31, 1985 via letter, John M. Fulton, Chairman BWROG to D. G. Eisenhut, USNRC.

In accordance with the instructions contained in the reference letter, our plant specific response for item 4.5.3

Mr. A. Schwencer, Chief

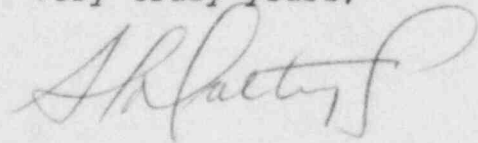
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will be submitted within 90 days after NRC issues its
evaluation of NEDC-30844.

Should you require any additional information, please do
not hesitate to contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "J. T. Wiggins". The signature is fluid and cursive, with a large, sweeping initial "J" and a long, horizontal stroke extending to the right.

cc: J. T. Wiggins, Resident Site Inspector
See Attached Service List