



PECO NUCLEAR

A Unit of PECO Energy

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

September 24, 1996

Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Limerick Generating Station, Units 1 and 2
Withdrawal of Certain Relief Request Revisions for the
First Ten Year Interval Pump and Valve Inservice
Testing Program

Gentlemen:

By letter dated July 25, 1996, PECO Energy submitted five (5) Relief Request revisions for the Limerick Generating Station (LGS), Units 1 and 2, First Ten Year Interval Pump and Valve Inservice Testing (IST) Program. These proposed IST Relief Request revisions request relief from the requirements of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code concerning leak rate testing and exercise testing of valves installed in various systems at LGS, Units 1 and 2. These revisions to the Relief Requests were considered necessary in order to support the implementation of a Technical Specifications (TS) change request (i.e., TS Change Request No. 95-14-0) which was submitted to the NRC by letter dated June 28, 1996, requesting approval to adopt the performance based 10CFR50, Appendix J, Option B, requirements at LGS, Units 1 and 2. The following Relief Request revisions were enclosed in our July 25, 1996, letter.

- **Relief Request No. GVRR-1, Revision 2, Containment Isolation Valve Leak Rate Testing.**
- **Relief Request No. 41-VRR-1, Revision 1, Exercise Testing of Feedwater System Primary Containment Isolation Valves.**
- **Relief Request No. 43-VRR-1, Revision 1, Exercise Testing of Recirculation Pump Seal Purge Primary Containment Isolation Valves.**
- **Relief Request No. 48-VRR-1, Revision 1, Exercise Testing of Standby Liquid Control System Primary Containment Isolation and Injection Valves.**
- **Relief Request No. 52-VRR-1, Revision 2, Exercise Testing of Containment Isolation and Pressure Isolation Function of Core Spray System Injection Check Valve.**

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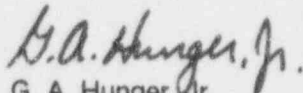
Subsequently, after further evaluation and discussion with the NRC, PECO Energy has decided to withdraw four (4) of the five (5) revised Relief Requests submitted to the NRC for review and approval by letter dated July 25, 1996. Therefore, we are requesting that the NRC discontinue its review of the following proposed Relief Request revisions.

- Relief Request No. 41-VRR-1, Revision 1
- Relief Request No. 43-VRR-1, Revision 1
- Relief Request No. 48-VRR-1, Revision 1
- Relief Request No. 52-VRR-1, Revision 2

However, we are still requesting that the NRC continue its review of revised Relief Request No. **GVR-1, Revision 2**. This Relief Request is still necessary to facilitate implementation of TS Change Request No. 95-14-0 regarding the adoption of performance based 10CFR50, Appendix J, Option B requirements. The details and justification associated with this revised Relief Request were provided in our July 25, 1996, letter. We would appreciate if the NRC would complete its review of revised Relief Request GVR-1, Revision 2, and grant the requested relief by January 1, 1997, in order to support the implementation schedule for TS Change Request No. 95-14-0.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,



G. A. Hunger, Jr.
Director - Licensing

cc: H. J. Miller, Administrator, USNRC, Region I
N. S. Perry, USNRC Senior Resident Inspector, LGS