
Safety Evaluation Report

related to the operation of
Limerick Generating Station,
Units 1 and 2

Docket Nos. 50-352 and 50-353

Philadelphia Electric Company

**U.S. Nuclear Regulatory
Commission**

Office of Nuclear Reactor Regulation

August 1985



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ABSTRACT

In August 1983 the staff of the Nuclear Regulatory Commission issued its Safety Evaluation Report (NUREG-0991) regarding the application of the Philadelphia Electric Company (the licensee) for licenses to operate the Limerick Generating Station, Units 1 and 2, located on a site in Montgomery and Chester Counties, Pennsylvania.

Supplement 1 to NUREG-0991 was issued in December 1983. Supplement 1 contains the comments made by the Advisory Committee on Reactor Safeguards in its interim report dated October 18, 1983. Supplement 2 was issued in October 1984. Supplement 3 was issued in October 1984 and addressed the remaining issues that required resolution before issuance of the operating license for Unit 1. A license for the operation of Limerick Unit 1 was issued on October 26, 1984.

The license, which was restricted to a five percent power level, contained conditions which required resolution prior to proceeding beyond the five percent power level. Supplement 4, issued in May 1985, addressed some of these issues. Supplement 4 also contained the comments made by the Advisory Committee on Reactor Safeguards in its report dated November 6, 1984, regarding full power operation of Limerick Unit 1. Supplement 5, issued in July 1985, and this Supplement 6 address further issues, principally the status of offsite emergency planning, that require resolution prior to proceeding beyond the five percent power level.

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1 INTRODUCTION AND GENERAL DISCUSSION

1.1 Introduction

In August 1983, the Nuclear Regulatory Commission staff (hereinafter referred to as the NRC staff or the staff) issued its Safety Evaluation Report (NUREG-0991) regarding the application by the Philadelphia Electric Company (hereinafter referred to as the licensee) for licenses to operate the Limerick Generating Station, Units 1 and 2 (hereinafter referred to as Limerick or the facility), Docket Nos. 50-352 and 50-353. The Safety Evaluation Report was supplemented by Supplement No. 1 in December 1983, which documented the resolution of several outstanding issues and also contained the comments made by the Advisory Committee on Reactor Safeguards in its interim report dated October 18, 1983. In October 1984 Supplement 2 to NUREG-0991 was issued. Also in October 1984 Supplement 3 to NUREG-0991 was issued, addressing all remaining issues necessary to permit the issuance of an operating license. Operating License No. NPF-27, restricted to five percent power, was issued on October 26, 1984.

Supplement 4 to the SER, issued in May 1985, addressed some of the issues required to be resolved prior to proceeding beyond the five percent power level and also included the comments of the ACRS in its report dated November 6, 1984, regarding the full power operation of Limerick Unit 1. Supplement 5 to the SER issued in July 1985, and this Supplement 6 address further issues, principally the status of offsite emergency planning, that require resolution prior to proceeding beyond the five percent power level.

The sections of this supplement are numbered the same as the corresponding section of the Safety Evaluation Report and Supplements No. 1 through 5. Each section is supplementary to and not in lieu of the discussion in the Safety Evaluation Report and Supplement No. 1 through 5 unless otherwise noted.

Copies of this SER Supplement are available for inspection at the NRC Public Document Room, 1717 H Street NW, Washington, DC and at the Public Document Room at the Pottstown Public Library, 500 High Street, Pottstown, Pennsylvania 19464. They may be ordered from the sources indicated on the inside front cover of this report.

The NRC Project Manager for Limerick is Mr. Robert E. Martin. Mr. Martin may be contacted by writing to the Division of Licensing, U.S. Nuclear Regulatory Commission, Washington, DC 20555.

Appendix A to this supplement is a continuation of the chronology of the staff's actions related to the processing of the Limerick application.

This supplement to the Safety Evaluation Report was prepared by the NRC staff. The NRC members who were principal contributors to this report are identified in Appendix H.

1.8 Outstanding Issues

The completion of the offsite emergency planning review was identified in SSER 3 and SSER 5 as being relevant to the authorization of operations beyond the five percent power level. The NRC staff's evaluation of the licensee's request for an exemption from the requirement of 10 CFR 50, Appendix E, Section IV.F.1 for the conduct of a full participation emergency preparedness exercise within one year before the issuance of a full power operating license is reported in Section 13.3 of this report.

6 ENGINEERED SAFETY FEATURES

6.2 Containment Systems

6.2.4 Containment Isolation Systems

In Section 6.2.4 of the Safety Evaluation Report (SER), NUREG-0991, the staff stated that it had reviewed the information provided by the applicant to demonstrate compliance with the provisions of NUREG-0737 Item II.E.4.2, Containment Isolation Dependability, and concluded that the applicant complied with these provisions. The intent of Item II.E.4.2(7) is to improve the reliability of the containment isolation function and to provide prompt isolation of the purge exhaust lines.

However, in a recent meeting held on June 20, 1985 in Bethesda Md, between representatives of the BWR Owners Group (BWROG) and the NRC, the staff was informed that it had misinterpreted the information presented in the Limerick FSAR (Figure 9.4-5) regarding the four 2" purge exhaust valves (valves HV-105, 118, 111, and 117). In particular, the 2" purge exhaust valves are not isolated as a result of a high radiation signal from a monitor within the flowpath of the effluent that would pass through these lines as recommended in SRP 6.2.4 per Item II.E.4.2(7) of NUREG-0737. However, these valves are automatically isolated by signals of high drywell pressure or low reactor vessel water level. The licensee contends that it was, and still is, their position that the four 2" purge exhaust valves need not be provided with a high radiation signal because it will not appreciably alter the already low probability of a significant release of radioactivity through these lines. This is also the position of the BWROG which is under review by the staff.

As stated in the Limerick FSAR, the four 2" purge exhaust valves are each equipped with a Reactor Enclosure Ventilation Exhaust Duct-high radiation signal (S signal). The staff mistakenly assumed the S signal met the criteria of SRP 6.2.4 (i.e., located in the flow path). However, as it was pointed out to the staff, via a telecon with the licensee on June 26, 1985, the S signal is not from a monitor within the flow path of the 2" purge exhaust valves and, therefore, does not meet the intent of the guidance in SRP 6.2.4.

Based on the above discussion the NRC staff withdraws its conclusion set forth in Section 6.2.4 of the Limerick SER regarding compliance of the four 2" purge exhaust valve to the provisions of Item II.E.4.2.(7) of NUREG-0737 and considers this item to be an open TMI action plan item that will need additional staff review. Since the staff is currently reviewing the BWROG position regarding this issue, which is identical to the Limerick licensee's position, the staff plans no special review for the Limerick plant. The staff will address this issue, upon completion of the evaluation of the BWROG position, in a further report.

The NRC staff concludes that continued operation of Limerick in the interim period is acceptable because the probability of an accident releasing radioactivity for which other diverse isolation signals would not prevent the

release of activity while this issue is being resolved is considered small, and because this particular line is open to the drywell for only short periods of time.

6.2.6 Containment Leakage Testing Program

Traversing Incore Probe (TIP) System

In Supplement No. 3 to the staff's Safety Evaluation Report (SSER 3) the staff discussed the 10 CFR 50, Appendix J leakage testing requirements as they relate to the traversing incore probe shear valves. To correct a typographical error it should be noted that the reference paragraphs of Appendix J, as discussed in SSER 3, are Paragraphs II.H.1 and III.C as opposed to III.H.1 and III.B.2.

13 CONDUCT OF OPERATIONS

13.3 Emergency Planning

13.3.1 Scheduling of Full Participation Exercise

In Supplement No. 5 of the NRC staff's Safety Evaluation Report (SSER 5), the staff concluded that the overall state of onsite and offsite emergency preparedness provides reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at the Limerick Generating Station. This conclusion was based on a review of the Federal Emergency Management Agency (FEMA) findings and determinations on the adequacy of state and local emergency plans and preparedness, and on the NRC assessment of the adequacy of the licensee's onsite emergency plans and preparedness. Since preparation of SSER 5, the Philadelphia Electric Company (licensee) has submitted a request dated June 24, 1985 for an exemption from the requirement of 10 CFR 50, Appendix E, Section IV.F.1, for the conduct of a full participation emergency preparedness exercise within one year before the issuance of a full power operating license. This request, which had been filed with the Commission, was referred to the Director of Nuclear Reactor Regulation by the Commission in an Order dated July 24, 1985.

Evaluation

The applicable provision of Section IV.F.1 provides that:

A full participation exercise which tests as much of the licensee, State and local emergency plans as is reasonably achievable without mandatory public participation shall be conducted for each site at which a power reactor is located for which the first operating license for that site is issued after July 13, 1982. This exercise shall be conducted within 1 year before the issuance of the first operating license for full power and prior to operation above 5% of rated power of the first reactor, and shall include participation by each State and local government within the plume exposure pathway EPZ and each State within the ingestion exposure pathway EPZ.

Consistent with other Commission emergency planning regulations in 10 CFR 50.47 and the associated Statement of Considerations, 47 FR 30232 dated July 13, 1982, the objective of Section IV.F.1 is to assure that an adequate state of emergency preparedness is demonstrated through the conduct of an emergency plan exercise within one year before a nuclear plant is authorized to exceed 5% of rated power.

A full participation exercise involving the testing of applicant, State and local emergency plans for Limerick was conducted on July 25, 1984 in expectation that a full power operating license would be issued within one year. In its request of June 24, 1985 the licensee stated that because of procedural delays in the licensing process related to the emergency plan for the State Correctional Institution at Graterford (SCIG), it is doubtful that a full power license will be issued on or before July 25, 1985. A hearing on the two admitted

Graterford contentions was held on July 15 and 16, 1985 and a Fourth Partial Initial Decision was issued on July 22, 1985, which found in favor of the licensee on these issues. A full power license was not issued prior to July 25, 1985. Although the FEMA and NRC staff evaluations of the previous exercises for Limerick were presented in SER Supplement No. 5, they will be addressed in this report specifically as they relate to the request for an exemption from Section IV.F.1 of Appendix E.

The offsite portion of July 25, 1984 exercise was observed and evaluated by FEMA and representatives of the member agencies of the FEMA Region III Regional Assistance Committee. FEMA provided its report of the exercise on September 25, 1984. In this report FEMA identified five "Category A" deficiencies. Category A deficiencies are defined as deficiencies of the type that would cause a finding that offsite emergency preparedness was not adequate to provide reasonable assurance that appropriate protective measures can be taken to protect the health and safety of the public in the vicinity of the plant in the event of a radiological emergency.

Since the initial exercise, a supplemental and several remedial exercises have been conducted to demonstrate correction of the Category A deficiencies. A supplemental exercise was conducted on November 20, 1984 for those municipalities and one support county which did not participate in the July 25, 1984 exercise. In a report to the NRC dated January 10, 1985, FEMA found that all participants in the exercise demonstrated their capability to respond to a radiological emergency. The non-participation of one municipality, however, was identified by FEMA as a Category A deficiency.

A remedial exercise to demonstrate the capability to implement the Graterford prison emergency plan was conducted on March 7, 1985. FEMA informed the NRC in a memorandum dated March 27, 1985 that the exercise adequately demonstrated an understanding of the emergency response procedures and the ability to implement them, and that a portion of one of the Category A deficiencies identified in the July 25, 1984 exercise had thus been corrected.

On April 10, 1985, a remedial exercise was conducted to allow participation by the school districts and South Coventry Township, the one municipality which did not participate in the earlier exercise. A final remedial exercise was conducted on April 22, 1985 to demonstrate the adequacy of the alert and notification capabilities of the various jurisdictions in the area within approximately ten miles of Limerick.

In a memorandum dated May 21, 1985, FEMA transmitted the exercise evaluation reports for the April 10 and 22, 1985 remedial exercises and provided its final interim finding on offsite planning and preparedness. FEMA stated that as a result of the July 25, 1984 full participation exercise, the November 20, 1984 supplemental exercise, the March 7, April 10 and April 22, 1985 remedial exercises, all Category A preparedness deficiencies have been corrected. FEMA concluded that offsite radiological emergency planning and preparedness is now adequate to provide reasonable assurance that protective measures can be implemented to protect the public health and safety in the event of a radiological emergency at the Limerick Generating Station.

Since the July 1984 full participation exercise, the Commonwealth of Pennsylvania has participated in a full participation exercise at the Susquehanna facility on

May 1, 1985 and is scheduled for another full participation exercise at the Three Mile Island facility in November 1985. In addition, the Commonwealth participated on a partial basis at the Peach Bottom exercise on October 17, 1984 and is scheduled to participate on a partial basis at the Beaver Valley exercise in September 1985. The Commonwealth is scheduled to participate in the next full participation exercise for the Limerick facility in April 1986. FEMA has advised the Staff that revising the exercise schedule to accommodate a full participation exercise at Limerick would be extremely difficult due to the Commonwealth's established schedule (which has been coordinated with FEMA, the utilities, other States and the NRC) and the large number of local response organizations involved. NRC Region I has also confirmed the difficulty of re-scheduling an exercise for Limerick.

The capability of local response organizations has been satisfactorily demonstrated through participation in the July 25, 1984 exercise and the subsequent supplemental and remedial exercises conducted between November 20, 1984 and April 22, 1985, as indicated above. The licensee also notes in its request that Chester county, one of the three counties in the plume exposure Emergency Planning Zone (EPZ), participated in the October 1984 exercise for the Peach Bottom facility and that Berks County, another county within the EPZ, will participate in the Three Mile Island exercise.

The licensee has assisted in the development and maintenance of local response capability, as indicated in the licensee's request, by making available planning and traffic engineering consultants to assist offsite authorities in the development of emergency plans and evacuation time estimates. The licensee has also provided an extensive amount of training for local emergency response personnel (approximately 8,500 persons in over 500 training sessions through June 21, 1985) including school administrators and staff, emergency workers such as police, fire and ambulance personnel, emergency operations center staff, and radiation monitoring personnel. The licensee states that extensive physical resources requested by offsite authorities have also been provided in order to upgrade the preparedness of counties, municipalities, and school districts within the plume exposure EPZ. In addition, the licensee has provided monitoring, security, and communications equipment and training assistance for the SCIG.

A second exercise of the licensee's emergency plan was conducted on April 3, 1985. No significant deficiencies were identified by the NRC observation team in this exercise, which was an onsite exercise only (See Inspection Report No. 50-352-/85-17 dated May 31, 1985). The staff concluded that, within the scope and limitations of the scenario, the licensee's performance demonstrated that it could adequately implement its emergency plan and procedures.

The licensee has provided information in its request on its ongoing program to maintain and demonstrate emergency preparedness prior to the scheduled exercise for April 1986. This effort will include monthly communication drills with the State and local agencies; a plant environmental and radiological monitoring drill involving field monitoring and analysis activities; a health physics drill involving response to, and analysis of, simulated elevated airborne and liquid samples, and direct radiation measurements in the environment; and practice exercises for emergency organization personnel using the Limerick emergency response facilities.

Based on a review of the licensee's exemption request, the NRC staff finds that the following factors support the granting of the requested exemption:

1. The conduct of a full participation emergency preparedness exercise on July 25, 1984, together with supplemental and remedial exercises through the period November 20, 1984 to April 22, 1985, leading to a favorable FEMA finding on offsite preparedness on May 21, 1985.
2. The participation of the Commonwealth of Pennsylvania in a full participation exercise at Susquehanna in May 1985 and the scheduled participation at Three Mile Island in November 1985. The Commonwealth also partially participated at the Peach Bottom exercise in October 1984 and is scheduled to partially participate at the Beaver Valley exercise in September 1985.
3. The participation of local response organizations in the full participation exercise for Limerick and subsequent supplemental and remedial exercises plus the involvement of these organizations, with the assistance of the licensee, in an ongoing training and development program.
4. The conduct of an onsite emergency preparedness exercise in April 1985 and the scheduling of various drills testing elements of the Limerick emergency plan, some of which involve offsite response agencies.

Comments Received

The NRC staff has received comments by R. L. Anthony/Friends of the Earth (Anthony/FOE) dated July 3, 1985 which oppose the licensee's request for an exemption. Anthony/FOE raised the following point relevant to the issue of whether the licensee should be exempted from a requirement to conduct a full participation emergency planning exercise within one year of being authorized to exceed five percent of rated power, "viz, Graterford has never been included in a full scale exercise...[Therefore a] new full participation exercise must be conducted after all deficiencies have been corrected and before a full power license is issued."

Contrary to Anthony/FOE's assertion, the SCIG has been included in a full scale exercise in a manner consistent with NRC regulations.¹ It was as a result of the July 1984 full participation exercise that FEMA found, as a part of a Category A deficiency, that the SCIG had not demonstrated the means for dealing with mobility impaired/transit dependent individuals. However, FEMA has determined that the March 7, 1985 remedial exercise adequately demonstrated that the SCIG authorities had an understanding of the emergency response procedures and the ability to implement them.

The Anthony/FOE comments also argue that if significant deficiencies in the emergency planning for the SCIG were identified as a result of the July 1985 Licensing Board hearing, a full participation exercise would be necessary to determine whether these deficiencies had been corrected. However, neither of

¹Section 50.47(b)(14) requires the conduct of periodic exercises "to evaluate major portions of emergency response capabilities..." (emphasis supplied). Section IV.F.4 of Appendix E to Part 50 provides that "participation in remedial exercises must be sufficient to show that appropriate corrective measures have been taken regarding the elements of the plan not properly tested in the previous exercises."

the issues that were litigated during the July 1985 hearings, e.g., assurance that training would be offered to civilian bus and ambulance drivers and assurance that the estimated time of evacuation can be achieved, were of the type that are evaluated during an exercise. In any event the Licensing Board's Fourth Partial Initial Decision of July 22, 1985 did not identify any deficiencies. Therefore, the staff concludes that the Anthony/FOE comments do not support the withholding of the exemption.

The NRC staff has also received comments by F. R. Romano/Air and Water Pollution Patrol (Romano/AWPP) dated June 28, 1985 which oppose the licensee's request for an exemption. The staff believes that the Romano/AWPP comments raise two issues related to emergency planning as a basis for withholding the requested exemption; namely the issue of sheltering as a response to radiological emergencies and deficiencies in emergency planning preparedness as reflected in activities conducted to date.

The sheltering issue was the subject of adjudication and also was raised in Romano/AWPP's comments dated March 11, 1985 in support of the 10 CFR 2.206 Petition by R. L. Anthony/FOE dated December 23, 1984. These comments represent an attempt to reintroduce an issue already resolved in the licensee's favor in the Licensing Board's Third Partial Initial Decision and in direct response to Romano/AWPP earlier efforts on this issue.^{2,3,4} In any event, the staff finds that the comments of Romano/AWPP concerning sheltering, while related to emergency planning in general, have no plausible connection to a determination of whether the licensee should be exempted from a requirement to conduct a second full participation emergency planning exercise prior to authorization to proceed beyond the five percent power level.

With respect to the comments by Romano/AWPP regarding the emergency planning and preparedness activities conducted to date, the staff believes that all aspects of the specific activities referred to by Romano/AWPP have been reviewed by FEMA and the NRC staff. The results of these reviews have been reported in SSER-5 wherein the NRC staff concluded that the overall state of onsite and off-site emergency preparedness provides reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at the Limerick Generating Station. As noted above, in connection with the staff's evaluation of the requested exemption, the results of the NRC and FEMA reviews of the prior activities support the granting of the relief requested.

²Third Partial Initial Decision of the Atomic Safety and Licensing Board, LBP-85-14, dated May 2, 1985 in the matter of Philadelphia Electric Company, Limerick Generating Station, Units 1 and 2 at pages 130-133 and 199-200.

³Memorandum and Order of the Atomic Safety and Licensing Board, ASLBP No. 81-465-07 OL, dated February 19, 1985 in the matter of Philadelphia Electric Company, Limerick Generating Station, Units 1 and 2.

⁴Memorandum and Order of the Atomic Safety and Licensing Board, rejecting AWPP's New Contention on Evacuation, dated September 14, 1984, in the matter of Philadelphia Electric Company, Limerick Generating Station Units 1 and 2.

CONCLUSION

Based on the foregoing, and in accordance with 10 CFR 50.12(a), the staff concludes that the exemption from the requirements of 10 CFR 50, Appendix E, Section IV.F.1, as discussed above, is authorized by law, will not endanger life or property or the common defense and security and is otherwise in the public interest. Moreover, the information provided by the licensee in the request for exemption and the staff's evaluation as set forth above demonstrate that the failure to have conducted a full participation exercise within one year of the date when Limerick Unit 1 receives a full power license does not constitute a "significant deficiency" in the emergency plans for the Limerick facility. See, 10 CFR 50.47(c)(1). Accordingly, the NRC staff finds that the standards of 10 CFR 50.12(a) and 10 CFR 50.47(c)(1) are met and that the exemption should be granted.

APPENDIX A

CHRONOLOGY

June 24, 1985	Licensee Motion Before The Commission For An Exemption From The Requirements of 10 CFR Part 50, Appendix E, Section IV.F.1, For The Conduct of a Full Participation Exercise Within One Year Before The Issuance of a Full Power Operating License.
June 26, 1985	Licensee letter transmitting response to Generic Letter 85-07 on integrated scheduling.
June 28, 1985	Licensee letter transmitting Control Room Design Review, Final Report, Supplement No. 2.
June 28, 1985	Response by F. Romano/Air and Water Pollution Patrol to Licensee's June 24 Motion.
July 3, 1985	Response by R. Anthony/Friends of the Earth to Licensee's June 24 Motion.
July 3, 1985	NRC staff letter to licensee regarding solid radwaste process control program.
July 11, 1985	Response by NRC staff to Licensee's June 24, 1985 Motion.
July 24, 1985	Order by the Commission referring the licensee's June 24, 1985 Motion to the Director, Nuclear Reactor Regulation.

APPENDIX H

This Supplement No. 6 to the SER is a product of the NRC staff. The NRC staff members listed below were principal contributors to this report.

<u>Name</u>	<u>Title</u>	<u>Branch</u>
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13. ABSTRACT (200 words or less) <p>In August 1983 the staff of the Nuclear Regulatory Commission issued its Safety Evaluation Report (NUREG-0991) regarding the application of the Philadelphia Electric Company (the licensee) for licenses to operate the Limerick Generating Station, Units 1 and 2, located on a site in Montgomery and Chester Counties, Pennsylvania.</p> <p>Supplement 1 was issued in December 1983. Supplement 2 was issued in October 1984. Supplement 3 was issued October 1984. Supplement 4 was issued in May 1985. Supplement 5 was issued in July 1985 and Supplement 6 issued in August 1985. This supplement 6 addresses further issues, principally the status of offsite emergency planning, that require resolution prior to proceeding beyond the five percent power level.</p>			
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