



PECO NUCLEAR

A Unit of PECO Energy

Station Support Department

10CFR50.90

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

February 25, 1997

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
Technical Specifications Change Request No. 96-06-0
Company Name Change

Gentlemen:

PECO Energy Company (PECO Energy) is submitting Technical Specifications (TS) Change Request No. 96-06-0, in accordance with 10CFR50.90, requesting a change to the Limerick Generating Station (LGS) Unit 1 and Unit 2 Facility Operating Licenses (FOLs), and Appendix B of the licenses (i.e., Environmental Protection Plan (EPP)), reflecting a corporate name change from Philadelphia Electric Company to PECO Energy Company. In addition, we are requesting changes to the LGS Units 1 and 2, FOL, and Appendix A (i.e., TS) of the licenses which will remove obsolete information and correct typographical errors.

Information supporting these changes is contained in Attachment 1 to this letter, and copies of the "marked-up" license pages are contained in Attachment 2. This information is being submitted under affirmation, and the required affidavit is enclosed.

We request that if approved, the changes be issued by August 1, 1997, and become effective within 30 days of issuance.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

G. A. Hunger, Jr.
Director - Licensing

Attachments
Enclosure

cc: H. J. Miller, Administrator, Region I, USNRC (w/attachment, enclosure)
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/attachment, enclosure)
R. R. Janati, PA Bureau of Radiation Protection (w/attachment, enclosure)

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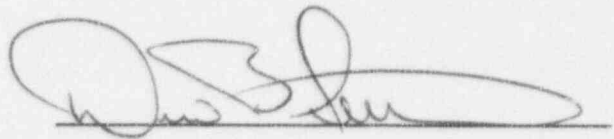


COMMONWEALTH OF PENNSYLVANIA :

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COUNTY OF CHESTER :

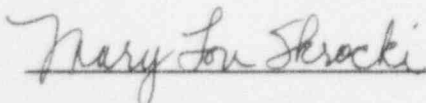
D. B. Feters, being first duly sworn, deposes and says: That he is Vice President of PECO Energy Company, the Applicant herein; that he has read the enclosed Technical Specifications Change Request No. 96-06-0 "Company Name Change," for Limerick Generating Station, Unit 1 and Unit 2, Facility Operating License Nos. 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.



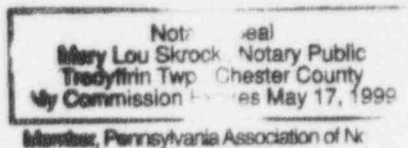
Subscribed and sworn to

before me this 24th day

of February 1997.



Notary Public



ATTACHMENT 1

LIMERICK GENERATING STATION
UNITS 1 AND 2

DOCKET NOS.

50-352

50-353

LICENSE NOS.

NPF-39

NPF-85

"COMPANY NAME CHANGE"

Information Supporting Changes - 8 Pages

DISCUSSION AND DESCRIPTION OF THE PROPOSED CHANGES

PECO Energy Company (PECO Energy) is requesting License changes which will reflect a name change from Philadelphia Electric Company to PECO Energy Company. The name change will alter the LGS Unit 1 and Unit 2 Facility Operating Licenses (FOLs), and Appendix B of the licenses (i.e., Environmental Protection Plan (EPP)). In addition, correction of typographical errors and elimination of obsolete information from the LGS Unit 1 and Unit 2 Facility Operating Licenses (FOLs), and Appendix A (i.e., Technical Specifications (TS)) of each license is requested.

TS SAFETY ASSESSMENT

The following changes and information supporting each change is provided.

NAME CHANGE

Change 1

In a letter dated December 21, 1993, the Philadelphia Electric Company (i.e., the licensee) informed the NRC that it was officially changing its name to PECO Energy Company effective January 1, 1994. PECO Energy Company is not a new corporation, or a successor corporation to Philadelphia Electric Company, but remained and continues to be the same company with a different name. As a result, contracts, agreements, obligations, licenses and permits relating to Philadelphia Electric Company continue to be legal, valid, and binding with respect to PECO Energy Company. This proposed change is editorial in nature and is necessary to ensure that the name on the LGS licenses corresponds to the company's new name.

Change 2

TS Administrative Controls Section 6.5.2.2 requires that members of the Nuclear Review Board (NRB) be appointed in writing by the Senior Vice President and Chief Nuclear Officer. PECO Energy recently established the position and title of President and Chief Nuclear Officer as the ranking officer of our Nuclear Business Unit. Therefore, in order to retain the same level of authority, Section 6.5.2.2 will be revised to eliminate the words Senior Vice President. Chief Nuclear Officer will be retained and will designate the ranking authority in the Nuclear Unit for NRB appointments.

TYPOGRAPHICAL ERRORS

Change 3

Unit 1 FOL, Section 2.E. contains a spelling error involving the word "Safeguards." This proposed change corrects the spelling error.

Change 4

Unit 1 and Unit 2 TS Index, page x, contains reference to Table 3.3.7.9.1 "Fire Detection Instrumentation." This Table was removed from Unit 1 and Unit 2 TS by letter from the NRC dated November 20, 1995, reflecting amendment numbers 104 and 68, respectively. The index reference to the Table was inadvertently overlooked, and no longer applies; therefore, it is proposed that it be deleted.

Change 5

Unit 1 and Unit 2 TS Bases Index, page xix, contains reference to Bases Section 3/4.3.8 "Turbine Overspeed Protection System." This Bases Section was removed from Unit 1 and Unit 2 TS by letter from the NRC dated August 24, 1995, reflecting amendment numbers 100 and 64, respectively. The Bases Index was inadvertently overlooked, and no longer applies; therefore, it is proposed to be deleted.

Change 6

Unit 1 and Unit 2 TS page 3/4 3-8 "Table 4.3.1.1-1" contains typographical and unit consistency errors. The Unit 1 TS's Table, column four, "CHANNEL CALIBRATION," is missing the footnote annotation(a). Unit 1 and Unit 2 TS's Table, footnote (b) reads "...to overlap for a least 1/2 decades..." however, the footnote should read "...to overlap for at least 1/2 decades..." These proposed changes will correct the noted errors.

Change 7

Unit 2 TS page 3/4 6-14 "Containment Systems, Surveillance Requirements(SR)," SR 4.6.2.1.e. contains a typographical error not consistent with Unit 1. To be consistent the word "calculation" should be changed to "calculated." This requirement was amended for Unit 1 and Unit 2 TS by letter from the NRC dated January 25, 1996, reflecting amendment numbers 108 and 71, respectively. The tense of the word was inadvertently in error; therefore, it is proposed to be corrected.

Change 8

Unit 1 and Unit 2 TS page 3/4 6-42 "Table 3.6.3-1 Notation," note 20. contains reference to the MSIV-LCS (Main Steam Isolation Valve - Leakage Control System). This system was physically removed, and therefore removed from Unit 1 and Unit 2 TS by letters from the NRC dated January 25, 1996 and February 16, 1995, reflecting amendment numbers 107 and 53, respectively. The note reference was inadvertently overlooked, no longer applies, and therefore is proposed to be deleted.

Change 9

Unit 1 and Unit 2 TS page 3/4 6-43 "Table 3.6.3-1 Notation," note 33. contains reference to the Secondary Containment Isolation Valve Tables 3.6.5.2.1-1, and 3.6.5.2.2-1. These Tables were removed from Unit 1 and Unit 2 TS by letter from the NRC dated November 20, 1995, reflecting amendment numbers 105 and 69, respectively. The note reference was inadvertently overlooked and no longer applies; therefore, it is proposed to be deleted.

Change 10

Unit 1 TS page 3/4 8-15 "Electrical Power Systems" contains a typographical error. Limiting Condition For Operation (LCO) 3.8.3.1 a. 2. states "Unit 2 Division 2, Consisting of:" the LCO should read "Unit 1 Division 2, Consisting of:" The unit designation error occurred during processing of amendment number 24, which was issued June 15, 1989. This proposed change will correct the noted unit error.

Change 11

Unit 1 and Unit 2 TS page 6-8 "Administrative Controls" Section 6.5.1.6 contains a typographical error. Responsibilities Section 6.5.1.6 "The PROC shall be responsible for:" should read "The PORC shall be responsible for:" This proposed change will correct the wording error.

Change 12

Unit 1 and Unit 2 TS page 3/4 3-103 "Offgas Gas Monitoring Instrumentation," Action b. requires that an explanation be submitted to the NRC in the next Semiannual Radioactive Effluent Release Report. The frequency for submitting the report was changed from semiannual to annual by letter from the NRC dated August 10, 1994, reflecting amendment numbers 73 and 35 for Unit 1 and Unit 2, respectively. The reference to the semiannual frequency was overlooked, and therefore is being changed to reflect the annual frequency.

OBSOLETE REQUIREMENTS

Change 13

Unit 1 FOL, Section 2.C.(4), references a requirement pertaining to Qualification of Personnel for a Unit 1 low power license. This requirement was fulfilled and documented in the LGS SER (NUREG-0991 Safety Evaluation Report related to the operation of Limerick Generating Station, Units 1 and 2, dated August 1983), Supplement 4, issued May 1985. Therefore, this requirement of the License is no longer necessary.

Change 14

Unit 1 FOL, Section 2.C.(5), references a requirement pertaining to ensuring operability of the Emergency Response Capabilities Safety Parameter Display within 30 days after the completion of the 100-Hour Warranty Run. This requirement was fulfilled and documented in the LGS SER, Supplement 8, issued June 1989. Therefore, this requirement of the License is no longer necessary.

Change 15

Unit 1 FOL, Section 2.C.(6), references a requirement pertaining to Post-Fuel Loading Initial Test Program. This requirement was fulfilled and documented in the LGS SER, Supplement 8, issued June 1989. Therefore, this requirement of the License is no longer necessary.

Change 16

Unit 1 FOL, Section 2.C.(7), references a requirement pertaining to the submittal of the Inservice Inspection Program. This requirement was fulfilled and documented in the LGS SER, Supplement 7, issued April 1989. Therefore, this requirement of the License is no longer necessary.

Change 17

Unit 1 FOL, Section 2.C.(8), references a requirement pertaining to implementation of commitments applicable to Generic Letter 83-28 "Salem ATWS Event." This requirement was fulfilled and documented in the LGS SER, Supplement 2, issued October 1984, Supplement 8, issued June 1989, and Supplement 9, issued August 1989. Therefore, this requirement of the License is no longer necessary.

Change 18

Unit 1 FOL, Section 2.C.(9), references a requirement pertaining to submittal of a turbine system maintenance program. This requirement was fulfilled and documented in the LGS SER, Supplement 8, issued June 1989. Therefore, this requirement of the License is no longer necessary.

Change 19

Unit 1 FOL, Section 2.C.(12), references a requirement pertaining to modifications to the Remote Shutdown System prior to startup following the first refueling outage. This requirement was fulfilled and documented in the LGS SER, Supplement 8, issued June 1989. Therefore, this requirement of the License is no longer necessary.

Change 20

Unit 1 FOL, Section 2.C.(14), references a requirement pertaining to connection of the Refueling Floor Volume to the Standby Gas Treatment System. This requirement was fulfilled and documented in the LGS SER, Supplement 7, issued April 1989. Therefore, this requirement of the License is no longer necessary.

Change 21

Unit 1 FOL, Section 2.C.(15), references a notice pertaining to the potential event that the NRC would find a lack of progress in completion of the Emergency Planning Procedures, which would be subject to 44 CFR Part 350. This notice was not necessary since LGS achieved and maintained an adequate state of emergency preparedness; therefore, this requirement of the License is no longer necessary.

Change 22

Unit 1 FOL, Section 2.D.(a), references an exemption pertaining to the General Design Criteria (GDC) 61, and the Standby Gas Treatment System operation during the first refueling outage. The time period for this exemption has passed; therefore, this reference in the License is no longer necessary.

Change 23

Unit 1 FOL, Section 2.D.(b), references an exemption pertaining to GDC 56, and the requirement for additional automatic isolation prior to startup following the first refueling outage. This requirement was fulfilled and documented in the LGS SER, Supplement 8, issued June 1989. Therefore, this reference contained in the License is no longer necessary.

Change 24

Unit 1 FOL, Section 2.D.(c), references an exemption pertaining to GDC 19, and condition of requiring modifications to the Remote Shutdown System. This requirement was fulfilled and documented in the LGS SER, Supplement 8, issued June 1989. Therefore, this reference contained in the License is no longer necessary.

Change 25

Unit 1 FOL, Section 2.D.(g), references a one-time exemption pertaining to the performance of local leak rate testing at the first refueling outage. This exemption was documented in the LGS SER. The time period for this exemption has passed; therefore, this reference in the License is no longer necessary.

Change 26

Unit 1 FOL, Section 2.D.(h), references a one-time exemption pertaining to inerting of containment six months after initial criticality. This exemption was documented in the LGS SER, Supplement 5, issued July 1985. Unit 2 FOL, Section 2.D.(e), references a one-time exemption pertaining to inerting of containment six months after initial criticality. This exemption was documented in the LGS SER, Supplement 9, issued August 1989. The time periods for these exemptions have passed; therefore, these references in the License are no longer necessary.

Change 27

Unit 1 FOL, Section 2.D.(i), references an exemption pertaining to conduct of a full participation emergency preparedness exercise within one year before issuance of a full power license. This exemption was documented in the LGS SER, Supplement 6, August, 1985. The time period for this exemption has passed; therefore, this reference in the License is no longer necessary.

Change 28

Unit 1 and Unit 2 TS pages 3/4 5-1, 3/4 5-2, 3/4 6-15, 3/4 6-16, 3/4 7-1, and 3/4 7-3 contain reference, by means of a footnote, to a one-time (i.e., temporary) change affecting the Allowed Outage Times (AOT) for Emergency Service Water, Residual Heat Removal Service Water, Residual Heat Removal and Core Spray Systems. Unit 1 TS amendment number 86 issued on January 27, 1995, and Unit 2 TS amendment number 70 issued on November 30, 1995 incorporated the footnotes. This allowance was necessary to perform modifications to the systems and was permitted one-time during the Unit 2 third refueling outage (i.e., January 1995) and one-time during the Unit 1 sixth refueling outage (i.e., January 1996). Since the modifications are complete on both units and the time period for this allowance has passed, these references in TS are no longer necessary.

Change 29

Unit 2 FOL, Section 2.D, references an exemption from criticality monitoring requirements of 10CFR 70.24. By letter dated November 22, 1988, the NRC authorized materials license SNM-1977 and an amendment to Construction Permit No. CPPR-107. The material license and amendment were effective until they were superseded by the LGS, Unit 2, operating license under 10CFR Part 50, or by an expiration date of December 31, 1992. These limitations were contained in the November 22, 1988 letter from the NRC, and in the materials license. The Unit 2 operating license was issued on August 25, 1989, thereby nullifying SNM-1977. This change will eliminate the obsolete exemption.

INFORMATION SUPPORTING A FINDING OF NO
SIGNIFICANT HAZARDS CONSIDERATION

PECO Energy Company has concluded that the proposed changes to the Limerick Generating Station Unit 1 and Unit 2 licenses, which will reflect the new company name, eliminate obsolete information, and correct typographical errors, do not involve a Significant Hazards Consideration. The editorial changes resulting from the company name change, typographical errors and obsolete requirements do not change or delete existing requirements contained in TS, which were not previously approved by the NRC or were time dependent, whereas they are now obsolete. Therefore, these changes to the FOL, the TS and the EPP will not potentially adversely impact accidents previously evaluated in the SAR. In support of this determination, an evaluation of each of three standards set forth in 10CFR50.92 is provided below.

1. The proposed TS changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The company name change and typographical corrections are editorial and will not alter the operation of equipment assumed to be an initiator of any analyzed event or transients previously evaluated. The license provisions were satisfactorily completed, and as such, have no effect on any previously evaluated accident scenario. The changes will not alter the operation of equipment assumed to be available for the mitigation of accidents or transients, nor will they alter the operation of equipment important to safety previously evaluated.

Therefore, the changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The company name change and typographical corrections are editorial and will not involve any physical changes to the plant systems, structures, or components. The license provisions were satisfactorily completed, and as such, have no effect on any previously evaluated accident scenario. The proposed changes do not allow plant operation in any mode that is not already evaluated. The changes will not alter the operation of equipment important to safety previously evaluated.

Therefore, the changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed TS changes do not involve a significant reduction in a margin of safety.

The company name change and typographical corrections are editorial and will not affect the manner in which the facility is operated, or change equipment or features which affect the operational characteristics of the facility. There is no margin of safety as defined in the bases of any TS regarding the name of the company, or affected by the corrections or deletion of obsolete license provisions.

Therefore, these proposed changes do not involve a significant reduction in a margin of safety.

INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

An Environmental Assessment is not required for the license (i.e., FOL, TS, and EPP) changes proposed by this request because the requested changes to the Limerick Generating Station, Unit 1 and Unit 2 licenses conform to the criteria for "actions eligible for categorical exclusion," as specified in 10 CFR 51.22(c)(9). The proposed changes do not involve a Significant Hazards Consideration as discussed in the preceding section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluent that may be released off-site. In addition, the proposed changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

CONCLUSION

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the Limerick Generating Station, Unit 1 and Unit 2, licenses and appendices, and have concluded that they do not involve an unreviewed safety question, they do not involve a significant hazards consideration, and they will not endanger the health and safety of the public.