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February 11, 1986

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket Nos.: 50-352
50-353

SUBJECT: Limerick Generating Station, Units 1 and 2
Updated Final Safety Analysis Report

Dear Mr. Denton:

10CFR50.71(e) requires that a revision of the original Final Safety Analysis Report (FSAR) be submitted within 24 months of the date of issuance of the facility operating license. The Unit 1 reactor of the Limerick Generating Station received its operating license on October 26, 1984; therefore, the Updated FSAR (UFSAR) is due by October 26, 1986. A scheduler exemption to this requirement is necessitated by the ongoing construction of Limerick Unit 2.

The UFSAR is to contain those pages of the FSAR that are still applicable, as well as any replacement pages that are required to incorporate all previous revisions, and to supply information that is current as of a maximum of six months prior to the date of filing. Since the Limerick FSAR covers both Unit 1, which is fully operational, and Unit 2, whose construction is approximately 31% complete, it would be necessary to generate and maintain a separate FSAR for each unit to fulfill the requirements of 50.71(e). To avoid the hardship and administrative difficulties that would result from this situation, it is hereby requested that a temporary scheduler exemption be granted delaying the submittal of the UFSAR until 12 months following issuance of a full power operating license for Limerick 2.

The UFSAR will be a complete, new document containing all of the information required by 50.71(e), current as of no more than six months prior to submittal, and incorporating all previous revisions to the FSAR. Subsequent revisions to the UFSAR will be filed at least annually and will reflect all changes made up to a maximum of six months prior to submittal.

ADD: BWR - L/BC's TECH SUPPORT

EB (LIAW)
PSB (L. HULMAN)
ECSB (SRINIVASAN)
RSB (ACTING)
FOB (VASSALLO)

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PDR ADOCK 05000352
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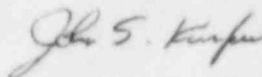
The existing FSAR will be kept current by periodic amendments during the period that the requested exemption is in effect, thus assuring that NRC is supplied with accurate information regarding both units on a timely basis. Such amendments will include the following changes:

- 1) Revisions necessary to reflect changes made to Unit 1 under 10CFR50.59. These submittals will be made no later than six months after the modification has been implemented.
- 2) Revisions applicable to Unit 2.
- 3) Typographical corrections.
- 4) Changes to the Quality Assurance Program description as required by 10CFR50.54(a)(3) and 10CFR50.55(f)(3).

When unit-specific changes are made, they will be reflected within the text of the revision.

This request for exemption from the requirements of 50.71(e) meets the requirements of 50.12 because it asks only for a delay in the submittal of the UFSAR to prevent the extreme administrative hardship that would result from maintaining a separate FSAR for each Limerick unit. This poses no risk whatsoever to the public health and safety or the common defense and security; since no changes to the facility itself are explicitly involved, this exemption will have no environmental impact. By revising the existing FSAR along the stringent guidelines specified for the UFSAR, the information requirements of 50.71(e) will be met during the period between the licensing of Limerick Unit 1 and Unit 2.

Very truly yours,



ACC/dg/01178602R

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