

Mr. James A. Hutton
 Director-Licensing, MC 62A-1
 PECO Energy Company
 Nuclear Group Headquarters
 Correspondence Control Desk
 P.O. Box No. 195
 Wayne, PA 19087-0195

March 14, 2000

Template - NRR-058

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 - ISSUANCE OF AMENDMENT RE: ADMINISTRATIVE CHANGES TO TECHNICAL SPECIFICATIONS (TAC NOS. MA6790 AND MA6791)

Dear Mr. Hutton:

The Commission has issued the enclosed Amendment No. 139 to Facility Operating License No. NPF-39 and Amendment No. 102 to Facility Operating License No. NPF-85 for the Limerick Generating Station (LGS), Units 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated September 27, 1999.

These amendments revise the TSs to clarify several administrative requirements, delete redundant requirements, and correct typographical errors, and is considered administrative in nature.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,
 /RA/

Bartholomew C. Buckley, Sr. Project Manager, Section 2
 Project Directorate I
 Division of Licensing Project Management
 Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

- Enclosures: 1. Amendment No. 139 to License No. NPF-39
 2. Amendment No. 102 to License No. NPF-85
 3. Safety Evaluation

URGENT FILE

cc w/encls: See next page

DISTRIBUTION:

File Center	MO'Brien	MFerdas, RGN-I	OGC
PUBLIC	BBuckley	PDI-2 Reading	EAdensam (Email)
JClifford	M. Ferdas, RGN-I	ACRS	RScholl (Email SE)
MOprendeck, RGN-I	GHill (4)	WBeckner	

DOCUMENT NAME: G:\PDI-2\Limerick\AMDa6790and91.wpd

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	PDI-2/PM	E	PDI-2/LA	PDI-2/RE	OGC	PDI-2/Se
NAME	BBuckley/rs		MO'Brien	MFerdas		JClifford
DATE	2/23/00		12/15/99		2/11/00	2/28/00

Official Record Copy

DF01



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 14, 2000

Mr. James A. Hutton
Director-Licensing, MC 62A-1
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, PA 19087-0195

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 - ISSUANCE OF
AMENDMENT RE: ADMINISTRATIVE CHANGES TO TECHNICAL
SPECIFICATIONS (TAC NOS. MA6790 AND MA6791)

Dear Mr. Hutton:

The Commission has issued the enclosed Amendment No. 139 to Facility Operating License No. NPF-39 and Amendment No. 102 to Facility Operating License No. NPF-85 for the Limerick Generating Station (LGS), Units 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated September 27, 1999.

These amendments revise the TSs to clarify several administrative requirements, delete redundant requirements, and correct typographical errors, and are considered administrative in nature.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in cursive script that reads "Bartholomew C. Buckley".

Bartholomew C. Buckley, Sr. Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures: 1. Amendment No.139 to
License No. NPF-39
2. Amendment No. 102 to
License No. NPF-85
3. Safety Evaluation

cc w/encls: See next page

Limerick Generating Station, Units 1 & 2

cc:

J. W. Durham, Sr., Esquire
Sr. V.P. & General Counsel
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101

Chief-Division of Nuclear Safety
PA Dept. of Environmental Resources
P.O. Box 8469
Harrisburg, PA 17105-8469

Manager-Limerick Licensing, 62A-1
PECO Energy Company
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

Director-Site Engineering
Limerick Generating Station
P.O. Box 2300
Sanatoga, PA 19464

Mr. James D. von Suskil, Vice President
Limerick Generating Station
Post Office Box 2300
Sanatoga, PA 19464

Manager-Experience Assessment
Limerick Generating Station
P.O. Box 2300
Sanatoga, PA 19464

Plant Manager
Limerick Generating Station
P.O. Box 2300
Sanatoga, PA 19464

Library
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Senior Manager-Operations
Limerick Generating Station
P.O. Box 2300
Sanatoga, PA 19464

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
Limerick Generating Station
P.O. Box 596
Pottstown, PA 19464

Dr. Judith Johnsrud
National Energy Committee
Sierra Club
433 Orlando Avenue
State College, PA 16803

Chairman
Board of Supervisors
of Limerick Township
646 West Ridge Pike
Linfield, PA 19468



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

PECO ENERGY COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 139
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by PECO Energy Company (the licensee) dated September 27, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 139 , are hereby incorporated into this license. PECO Energy Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: March 14, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 139

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3/4 8-16a

3/4 8-19

6-2

6-7

6-13

6-16

Insert

3/4 8-16a

3/4 8-19

6-2

6-7

6-13

6-16

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

b. D.C. Power Distribution Panels

1. Unit 1 Division 1, Consisting of:
 - a) 250-V DC Fuse Box: 1FA (1AD105)
 - b) 250-V DC Motor Control Center: 1DA (10D201)
 - c) 125-V DC Distribution Panels: 1PPA1 (1AD102)
1PPA2 (1AD501)
1PPA3 (1AD162)
2. Unit 1 Division 2, Consisting of:
 - a) 250-V DC Fuse Box: 1FB (18D105)
 - b) 250-V DC Motor Control Centers: 1DB-1 (10D202)
1DB-2 (10D203)
 - c) 125-V DC Distribution Panels: 1PPB1 (18D102)
1PPB2 (18D501)
1PPB3 (18D162)
3. Unit 1 Division 3, Consisting of:
 - a) 125-V DC Fuse Box: 1FC (1CD105)
 - b) 125-V DC Distribution Panels: 1PPC1 (1CD102)
1PPC2 (1CD501)
1PPC3 (1CD162)
4. Unit 1 Division 4, Consisting of:
 - a) 125-V DC Fuse Box: 1FD (1DD105)
 - b) 125-V DC Distribution Panels: 1PPD1 (1DD102)
1PPD2 (1DD501)
1PPD3 (1DD162)
5. Unit 2 and Common Division 1, Consisting of:
 - a) 250-V DC Fuse Box: 2FA (2AD105)
 - b) 125-V DC Distribution Panels: 2PPA1 (2AD102)
2PPA2 (2AD501)
6. Unit 2 and Common Division 2, Consisting of:
 - a) 250-V DC Fuse Box: 2FB (28D105)
 - b) 125-V DC Distribution Panels: 2PPB1 (28D102)
2PPB2 (28D501)
7. Unit 2 and Common Division 3, Consisting of:
 - a) 125-V DC Fuse Box: 2FC (2CD105)
 - b) 125-V DC Distribution Panels: 2PPC1 (2CD102)
2PPC2 (2CD501)
8. Unit 2 and Common Division 4, Consisting of:
 - a) 125-V DC Fuse Box: 2FD (2DD105)
 - b) 125-V DC Distribution Panels: 2PPD1 (2DD102)
2PPD2 (2DD501)

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

b. D.C. Power Distribution:

1. Unit 1 Division 1, Consisting of:
 - a) 250-V DC Fuse Box: 1FA (1AD105)
 - b) 250-V DC Motor Control Center: 1DA (10D201)
 - c) 125-V DC Distribution Panels: 1PPA1 (1AD102)
1PPA2 (1AD501)
1PPA3 (1AD162)
2. Unit 1 Division 2, Consisting of:
 - a) 250-V DC Fuse Box: 1FB (1BD105)
 - b) 250-V DC Motor Control Centers: 1DB-1 (10D202)
1DB-2 (10D203)
 - c) 125-V DC Distribution Panels: 1PPB1 (1BD102)
1PPB2 (1BD501)
1PPB3 (1BD162)
3. Unit 1 Division 3, Consisting of:
 - a) 125-V DC Fuse Box: 1FC (1CD105)
 - b) 125-V DC Distribution Panels: 1PPC1 (1CD102)
1PPC2 (1CD501)
1PPC3 (1CD162)
4. Unit 1 Division 4, Consisting of:
 - a) 125-V DC Fuse Box: 1FD (1DD105)
 - b) 125-V DC Distribution Panels: 1PPD1 (1DD102)
1PPD2 (1DD501)
1PPD3 (1DD162)
5. Unit 2 and Common Division 1, Consisting of:
 - a) 250-V DC Fuse Box: 2FA (2AD105)
 - b) 125-V DC Distribution Panels: 2PPA1 (2AD102)
2PPA2 (2AD501)
6. Unit 2 and Common Division 2, Consisting of:
 - a) 250-V DC Fuse Box: 2FB (2BD105)
 - b) 125-V DC Distribution Panels: 2PPB1 (2BD102)
2PPB2 (2BD501)
7. Unit 2 and Common Division 3, Consisting of:
 - a) 125-V DC Fuse Box: 2FC (2CD105)
 - b) 125-V DC Distribution Panels: 2PPC1 (2CD102)
2PPC2 (2CD501)
8. Unit 2 and Common Division 4, Consisting of:
 - a) 125-V DC Fuse Box: 2FD (2DD105)
 - b) 125-V DC Distribution Panels: 2PPD1 (2DD102)
2PPD2 (2DD501)

ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in OPERATIONAL CONDITION 1, 2, or 3, at least one licensed Senior Operator shall be in the control room;
- c. A Health Physics Technician* shall be on site when fuel is in the reactor;
- d. ALL CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE TRM.
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shut-down for refueling, major maintenance, or major unit modifications, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

*The Health Physics Technician position may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required position.

ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 Training programs for the unit staff shall be maintained under the direction of the site training organization. The retraining and replacement training programs for all affected positions except licensed operators shall meet or exceed the standards of ANSI/ANS 3.1-1978. The retraining and replacement training programs for licensed operators shall comply with the requirements of 10 CFR 55, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

- Plant Operations
- Engineering
- Maintenance
- Instrumentation and Controls
- Planning
- Radiation Safety
- Chemistry
- Experience Assessment

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairmen of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.
- b. The applicable procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737.
- c. Refueling operations.
- d. Surveillance and test activities of safety-related equipment.
- e. Security Plan implementation.
- f. Emergency Plan implementation.
- g. Fire Protection Program implementation.
- h. PROCESS CONTROL PROGRAM implementation.
- i. OFFSITE DOSE CALCULATION MANUAL implementation.
- j. Quality Assurance Program for effluent and environmental monitoring, using the guidance of Regulatory Guide 4.15, February 1979.

6.8.2 Each procedure of Specification 6.8.1, and changes thereto, and any other procedure or procedure change that the Plant Manager determines to affect nuclear safety, shall be reviewed and approved in accordance with Specifications 6.5.1.6, 6.5.1.7 and/or 6.5.3, as appropriate, prior to implementation. Each procedure of Specification 6.8.1 shall also be reviewed as set forth in Administrative Procedures.

6.8.3 Temporary changes to procedures of Specification 6.8.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator license on the unit affected; and
- c. The change is documented, reviewed by an SQR in accordance with Specification 6.5.3.1, and approved by either the Plant Manager or his designated alternate in accordance with Specification 6.1.1, or the Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that procedure within 14 days of implementation.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS (Continued)

dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totalling <20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions. The report shall be submitted by April 30 of each year.

- b. (Deleted)
- c. Any other unit unique reports required on an annual basis.
- d. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.5. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Cleanup system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

MONTHLY OPERATING REPORTS*

6.9.1.6 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the main steam system safety/relief valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC no later than the 15th of each month following the calendar month covered by the report.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT*

6.9.1.7 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

*A single submittal may be made for a multiple unit station.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

PECO ENERGY COMPANY

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 102
License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by PECO Energy Company (the licensee) dated September 27, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

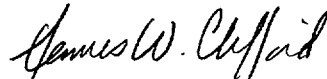
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 102, are hereby incorporated in the license. PECO Energy Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: March 14, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 102

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3/4 8-16a

3/4 8-19

6-2

6-7

6-13

6-16

Insert

3/4 8-16a

3/4 8-19

6-2

6-7

6-13

6-16

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

b. D.C. Power Distribution Panels

1. Unit 2 Division 1, Consisting of:
 - a) 250-V DC Fuse Box: 2FA (2AD105)
 - b) 250-V DC Motor Control Center: 2DA (20D201)
 - c) 125-V DC Distribution Panels: 2PPA1 (2AD102)
2PPA2 (2AD501)
2PPA3 (2AD162)
2. Unit 2 Division 2, Consisting of:
 - a) 250-V DC Fuse Box: 2FB (2BD105)
 - b) 250-V DC Motor Control Centers: 2DB-1 (20D202)
2DB-2 (20D203)
 - c) 125-V DC Distribution Panels: 2PPB1 (2BD102)
2PPB2 (2BD501)
2PPB3 (2BD162)
3. Unit 2 Division 3, Consisting of:
 - a) 125-V DC Fuse Box: 2FC (2CD105)
 - b) 125-V DC Distribution Panels: 2PPC1 (2CD102)
2PPC2 (2CD501)
2PPC3 (2CD162)
4. Unit 2 Division 4, Consisting of:
 - a) 125-V DC Fuse Box: 2FD (2DD105)
 - b) 125-V DC Distribution Panels: 2PPD1 (2DD102)
2PPD2 (2DD501)
2PPD3 (2DD162)
5. Unit 1 and Common Division 1, Consisting of:
 - a) 250-V DC Fuse Box: 1FA (1AD105)
 - b) 125-V DC Distribution Panels: 1PPA1 (1AD102)
1PPA2 (1AD501)
6. Unit 1 and Common Division 2, Consisting of:
 - a) 250-V DC Fuse Box: 1FB (1BD105)
 - b) 125-V DC Distribution Panels: 1PPB1 (1BD102)
1PPB2 (1BD501)
7. Unit 1 and Common Division 3, Consisting of:
 - a) 125-V DC Fuse Box: 1FC (1CD105)
 - b) 125-V DC Distribution Panels: 1PPC1 (1CD102)
1PPC2 (1CD501)
8. Unit 1 and Common Division 4, Consisting of:
 - a) 125-V DC Fuse Box: 1FD (1DD105)
 - b) 125-V DC Distribution Panels: 1PPD1 (1DD102)
1PPD2 (1DD501)

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

c)	125-V DC Distribution Panels:	2PPA1 2PPA2 2PPA3	(2AD102) (2AD501) (2AD162)
2.	Unit 2 Division 2, Consisting of:		
a)	250-V DC Fuse Box:	2FB	(28D105)
b)	250-V DC Motor Control Centers:	2DB-1 2DB-2	(20D202) (20D203)
c)	125-V DC Distribution Panels:	2PPB1 2PPB2 2PPB3	(28D102) (28D501) (28D162)
3.	Unit 2 Division 3, Consisting of:		
a)	125-V DC Fuse Box:	2FC	(2CD105)
b)	125-V DC Distribution Panels:	2PPC1 2PPC2 2PPC3	(2CD102) (2CD501) (2CD162)
4.	Unit 2 Division 4, Consisting of:		
a)	125-V DC Fuse Box:	2FD	(2DD105)
b)	125-V DC Distribution Panels:	2PPD1 2PPD2 2PPD3	(2DD102) (2DD501) (2DD162)
5.	Unit 1 and Common Division 1, Consisting of:		
a)	250-V DC Fuse Box:	1FA	(1AD105)
b)	125-V DC Distribution Panels:	1PPA1 1PPA2	(1AD102) (1AD501)
6.	Unit 1 and Common Division 2, Consisting of:		
a)	250-V DC Fuse Box:	1FB	(1BD105)
b)	125-V DC Distribution Panels:	1PPB1 1PPB2	(1BD102) (1BD501)
7.	Unit 1 and Common Division 3, Consisting of:		
a)	125-V DC Fuse Box:	1FC	(1CD105)
b)	125-V DC Distribution Panels:	1PPC1 1PPC2	(1CD102) (1CD501)
8.	Unit 1 and Common Division 4, Consisting of:		
a)	125-V DC Fuse Box:	1FD	(1DD105)
b)	125-V DC Distribution Panels:	1PPD1 1PPD2	(1DD102) (1DD501)

APPLICABILITY: OPERATIONAL CONDITIONS 4, 5, and *.

ACTION:

- a. With less than two divisions of the above required Unit 2 A.C. distribution systems energized, suspend CORE ALTERATIONS, handling of irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel.

* When handling irradiated fuel in the secondary containment.

ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in OPERATIONAL CONDITION 1, 2, or 3, at least one licensed Senior Operator shall be in the control room;
- c. A Health Physics Technician* shall be on site when fuel is in the reactor;
- d. ALL CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE TRM.
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shut-down for refueling, major maintenance, or major unit modifications, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.

*The Health Physics Technician position may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required position.

ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 Training programs for the unit staff shall be maintained under the direction of the site training organization. The retraining and replacement training programs for all affected positions except licensed operators shall meet or exceed the standards of ANSI/ANS 3.1-1978. The retraining and replacement training programs for licensed operators shall comply with the requirements of 10 CFR 55, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

- Plant Operations
- Engineering
- Maintenance
- Instrumentation and Controls
- Planning
- Radiation Safety
- Chemistry
- Experience Assessment

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairmen of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.
- b. The applicable procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737.
- c. Refueling operations.
- d. Surveillance and test activities of safety-related equipment.
- e. Security Plan implementation.
- f. Emergency Plan implementation.
- g. Fire Protection Program implementation.
- h. PROCESS CONTROL PROGRAM implementation.
- i. OFFSITE DOSE CALCULATION MANUAL implementation.
- j. Quality Assurance Program for effluent and environmental monitoring, using the guidance of Regulatory Guide 4.15, February 1979.

6.8.2 Each procedure of Specification 6.8.1, and changes thereto, and any other procedure or procedure change that the Plant Manager determines to affect nuclear safety, shall be reviewed and approved in accordance with Specifications 6.5.1.6, 6.5.1.7 and/or 6.5.3, as appropriate, prior to implementation. Each procedure of Specification 6.8.1 shall also be reviewed as set forth in Administrative Procedures.

6.8.3 Temporary changes to procedures of Specification 6.8.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator license on the unit affected; and
- c. The change is documented, reviewed by an SQR in accordance with Specification 6.5.3.1, and approved by either the Plant Manager or his designated alternate in accordance with Specification 6.1.1, or the Director or Manager designated by Administrative Procedures as the responsible Director or Manager for that procedure within 14 days of implementation.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS (Continued)

dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totalling <20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions. The report shall be submitted by April 30 of each year.

- b. (Deleted)
- c. Any other unit unique reports required on an annual basis.
- d. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.5. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Cleanup system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

MONTHLY OPERATING REPORTS*

6.9.1.6 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the main steam system safety/relief valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC no later than the 15th of each month following the calendar month covered by the report.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT*

6.9.1.7 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The initial report shall be submitted prior to May 1 of the year following initial criticality. The report shall include summaries, interpretations, analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

*A single submittal may be made for a multiple unit station.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 139 AND 102 TO FACILITY OPERATING

LICENSE NOS. NPF-39 AND NPF-85

PECO ENERGY COMPANY

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated September 27, 1999, the PECO Energy Company (the licensee) submitted a request for changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TSs). The proposed amendment would revise the TSs to clarify several administrative requirements, delete redundant requirements, and correct typographical errors, and is considered administrative in nature. These revisions affect TS Sections 3.8.3.1, 8.8.3.2, 6.2.2, 6.5.1.2, 6.8.2, 6.9.1.5, and 6.9.1.6.

2.0 BACKGROUND

The licensee performed a review to determine where opportunities for clarification were needed to be made between LGS Units 1 and 2 administrative practices and the requirements in TS Section 6.0, "Administrative Controls." As a result of their findings, the licensee proposed the following changes to the TSs for LGS Units 1 and 2

- TS Section 6.2.2.f will be revised to reference a "nominal" 40-hour week and the specific reference to a "normal 8-hour day" will be deleted.
- TS Section 6.5.1.2 will be revised to clarify that several individuals may be qualified to fill the position of Alternate Plant Operations Review Committee (PORC) Chairman by changing the word "Chairman" to "Chairmen."
- TS Section 6.8.2 will be revised to eliminate the implication of a scheduled periodic review for procedure reviews by deleting the word "periodically."
- TS Section 6.9.1.5 will be revised to remove a redundant requirement of reporting challenges to the Safety Relief Valves (SRVs).

In addition, several typographical errors were identified by the licensee in TS Sections 3.8.3.1 and 3.8.3.2. The licensee proposed the following corrections to the LGS Units 1 and 2 TS.

- TS Sections 3.8.3.1.b.7.a) and 8.a), and TS Sections 3.8.3.2.b.7.a) and 8.a) will be revised to correctly identify fuse boxes 2(1)FC and 2(1)FD as 125-V DC fuse boxes.

Also, several editorial errors were identified by the licensee and are described below.

- Units 1 and 2 TS Section 3.8.3.1.b.1.b) will be revised to remove the letter “s” from the end of the phrase “Motor Control Centers” since only one motor control center is identified.
- Unit 1 TS Section 3.8.3.1.b.7.b) will be revised to capitalize the “P” in the word “panels” and replace the semicolon (;) at the end of the phrase with a colon (:).
- Unit 1 and 2 TS Section 6.2.2.b will be revised to replace the colon (:) at the end of this item with a semicolon (;) for consistency with similar items on the affected TS page.
- Unit 2 TS Section 6.9.1.6 will be revised to correct the format of the addressee for submittal of the Monthly Operating Reports to the “U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555.”

The licensee’s submittal states that the proposed TS changes are considered to be administrative in nature and do not alter the manner in which any structure, system, or component is operated, tested, or maintained.

3.0 EVALUATION

The staff evaluated each of the proposed TS changes as described below:

3.1 Change 1

LGS Units 1 and 2 TS Section 6.2.2, “Unit Staff,” Item f., describes the overtime restrictions for station staff who perform safety-related functions. The licensee’s submittal states that the objective of this item is to have operating personnel work a “normal 8-hour day, 40 hour week.” LGS personnel currently work a variety of scheduled hours ranging from 8-hour to 12-hour days, while still maintaining the overtime restrictions in TS 6.2.2.f. The licensee proposes to revise the reference to a “nominal” 40-hour week and proposes the current reference to a “normal 8-hour day” be deleted.

Generic Letter (GL) 82-12, “Nuclear Power Plant Staff Working Hours,” states that licensees of operating plants shall establish controls to prevent situations where fatigue could reduce the ability of staff who perform safety-related functions. GL 82-12 goes further to say that the objective is to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, the NRC has recognized that licensed operators, station staff who perform safety-related functions, may work up to 12-hour shifts at some utilities, and that working the additional hours beyond the “normal 8 hour day” does not cause an undue risk and conforms with the requirements of 10 CFR Part 55.53.

In addition, GL 82-12 issued restrictions or limitations that would preclude the use of routine or “heavy” overtime and, therefore, prevent station personnel involved in safety-related activities from working in a fatigued condition. These restrictions are presently incorporated into LGS Units 1 and 2 TS 6.2.2.f, Item 1 through 4, and are implemented through procedure A-C-40. These restrictions will not be affected by this proposed TS revision.

LGS Units 1 and 2 still will maintain restrictions and limitations to prevent station personnel from performing safety-related functions while in a fatigued condition and, therefore, the proposed change is acceptable.

3.2 Change 2

LGS Units 1 and 2 TS Section 6.5.1.2 describes the composition of the Plant Operations Review Committee (PORC). This section identifies two specific positions that are filled by the PORC member as appointed by the Plant Manager, i.e., the PORC Chairman and the Alternate PORC Chairman. The licensee feels that this reference implies there is only "one" Alternate PORC Chairman. The licensee proposes to revise this TS section to clarify that several individuals may be qualified to fill the position of Alternate PORC Chairman by changing the word "Chairman" to "Chairmen."

The TS does not stipulate or require that the Alternative PORC Chairman satisfy any additional qualifications criteria to serve in his position. This change does not affect the current qualification criteria and the process for qualification of an individual as a PORC member. As stated by the licensee, this change will not affect the level of reviews performed by a PORC quorum and will remain consistent, regardless of who has been selected to serve as the Alternate PORC Chairmen. Therefore, the staff finds this change to be acceptable.

3.3 Change 3

LGS Units 1 and 2 TS Section 6.8.2 requires that procedures required by TS Section 6.8.1 be reviewed "periodically" as set forth in the Administrative Procedures. The licensee proposes to eliminate the implication of a scheduled periodic review by deleting the word "periodically."

By letter dated July 14, 1992, the Nuclear Regulatory Commission approved a change to the Quality Assurance Program Description in the LGS Updated Final Safety Analysis Report (UFSAR) to eliminate the scheduled periodic reviews of procedures due to other programmatic controls and processes that ensure that procedures are reviewed and appropriately maintained. In addition, LGS UFSAR Chapter 13 Section 13.5, "Plant Procedures," states that programmatic controls are in place to assure that procedures are maintained current; and that these controls take the place of and eliminate the need for scheduled periodic reviews and revisions. These controls, as stated by the licensee, ensure that the plant continues to be operated in a safe and efficient manner and do not pose an undue risk to the health and safety of the public. These existing programmatic controls are not being changed by the proposed change. Therefore, the staff finds this change acceptable.

3.4 Change 4

LGS Units 1 and 2 TS Section 6.9.1.5.b requires that documentation of all challenges to Safety Relief Valves (SRVs) be included in an annual report to the NRC. The licensee proposes to remove this reporting requirement from the TSs.

TS Section 6.9.1.5.b requires that all challenges to the SRVs be documented and be included in an annual report to the NRC. This same information is required to be included in the Monthly Operating Reports as specified in TS Section 6.9.1.6. In addition, SRV challenges that take

place would be addressed by the LGS onsite corrective action program. This program identifies the root cause and addresses the appropriate action to correct the problem and to prevent it from occurring in the future. This change in reporting does not affect the corrective action program. The licensee states that the documentation and reporting of all SRV challenges to the NRC on a yearly basis is purely administrative and has no direct impact on the operation of the plant. Due to the redundant nature of this requirement, the staff finds this change to be acceptable.

3.5 Change 5

In the current LGS Units 1 and 2 TS Sections 3.8.3.1.b.7.a), 3.8.3.1.b.8.a), 3.8.3.2.b.7.a), and 3.8.3.2.b.8.a) incorrectly identify the 125-V DC fuse boxes 2(1)FC and 2(1)FD as 250-V DC fuse boxes. The licensee proposes to correct this typographical error, by correctly identifying the above fuse boxes as 125-V DC fuse boxes.

The licensee stated in its submittal that the drawings and procedures associated with the 125-V DC fuse boxes are correct and that the as-built configuration is correct. The staff verified through the UFSAR Figure 8.3-3, sheet 4 and 5, Rev.8, dated November 1998, that the 2(1)FC and 2(1)FD fuse boxes are rated at 125-V DC. This is an administrative change, so that the TSs can accurately represent the current plant configuration and, therefore, the staff finds these changes to be acceptable.

3.6 Change 6

The licensee's proposed corrections to the editorial errors described within this SE are purely administrative. These changes provide consistency within the TS for both Units and have no impact on plant safety. Therefore, the proposed changes are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact has been prepared and published in the Federal Register on March 3, 2000 (65 FR 11612). Accordingly, based on the environmental assessment, the staff has determined that the issuance of the amendment will not have a significant effect on the quality of the human environment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by

operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: M. Ferdas

Date: March 14, 2000