Station Support Department

PECO NUCLEAR
A Unit of PECO Energy

10 CFR 50.90

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

December 9, 1996

Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

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

Subject: Limerick Generating Station, Units 1 and 2
Technical Specifications Change Request No. 95-14-0
Response to Request for Additional Information

Gentlemen:

By letter dated June 28, 1996, PECO Energy Company submitted Limerick Generating Station (LGS), Unit 1 and Unit 2, Technical Specifications (TS) Change Request No. 95-14-0 that proposed adopting 10CFR 50, Appendix J, Option B, performance based testing. By telephone conversation on December 6, 1996, the NRC requested additional information involving TS Change Request No. 95-14-0. Specifically, the NRC requested the test results pertaining to the primary containment drywell-to-suppression chamber bypass leakage since November 30, 1993. The following provides the requested information.

Since the November 30, 1993, PECO Energy TS Change Request No. 93-07-0 letter, which requested that the primary containment drywell-to-suppression chamber bypass leak test coincide with the 10 CFR 50, Appendix J, Type A Test (i.e., containment integrated leakage rate test) interval, no Type A Tests have been required to be performed at either LGS unit; therefore, no bypass tests have been performed. However, TS Surveillance Requirement Specification 4.6.2.1.f requires performance of an alternate test (i.e., vacuum breaker leak test) during each refueling outage when the drywell-to-suppression chamber bypass test is not performed. The surveillance requirement test is conducted to ensure that the total vacuum breaker leakage area is less than or equal to 24% of the specified limit, and the leakage area for an individual set of vacuum breakers is less than or equal to 12% of the specified limit.

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The TS surveillance test results (since the November 30, 1993, letter) are provided below. Please note there is a difference in the percentage of the overall limit comparing the bypass test results contained in the November 30, 1993 letter, and the alternate test results (i.e., bypass test = 1.55% to 5.56% and vacuum breaker test = 0.06% to 0.4%). This difference is due to inherent inaccuracies involved with the bypass test (e.g., large volume, duration of test, and test measurement points) compared to the vacuum breaker alternate test.

TS SR 4.6.2.1.f Results:

Unit 1 - February 1994*	Total area = 0.4% of specified limit Largest individual set area = 0.1% of specified limit
Unit 2 - February 1995	Total area = 0.08% of specified limit Largest individual set area = 0.04% of specified limit
Unit 1 - February 1996	Total area = 0.06% of specified limit Largest individual set area = 0.03% of specified limit

**The test equipment used prior to 1995 was less accurate than that which is currently used.*

This additional information is being submitted under affirmation and the associated affidavit is enclosed.

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

Very truly yours,

G. A. Hunger, Jr.

G. A. Hunger, Jr.
Director - Licensing

Enclosure

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

COMMONWEALTH OF PENNSYLVANIA :

: SS

COUNTY OF CHESTER :

D. B. Fetters, 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 additional information supporting Technical Specifications Change Request No. 95-14-0 "Adoption of Performance Based 10 CFR 50, Appendix J, Option B Testing," 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 9th day
of December 1996.

Notary Public

Notarial Seal
Mary Lou Skrocki, Notary Public
Tredyffrin Twp. Chester County
Commission May 17, 19
Member, Pennsylvania Association of