

applicable requirements of the safety analysis are met by the assemblies.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

The proposed change does not:

I. Involve a significant increase in the probability or consequences of an accident previously evaluated.

Incorporation of this proposed change of adding reference NEDE-24011-P-A-10, "General Electric Standard Application for Reactor Fuel" to the list of references in [the] Unit 2 Technical Specifications will allow the use of the GE methodology to calculate the operating limits for the four GE Lead Use Assemblies which are of a different mechanical design than the Siemens 9X9 fuel [currently installed in the reactor core]. This NRC approved methodology will be referenced as the approved methodology in showing that all applicable safety limits of the safety analysis are met by the four GE-12 LUAs. Results of incorporating this change will not significantly increase the probability or the consequences of an accident previously evaluated.

II. Create the possibility of a new or different kind of accident from any accident previously evaluated.

As stated above, the incorporation of this change will allow the use of the GE methodology to be referenced as the approved methodology to show that all applicable limits of the safety analysis are met by the four GE-12 LUAs. Therefore, the incorporation of this change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

III. Involve a significant reduction in a margin of safety.

The use of the GE methodology will not result in a change in safety margin, but will ensure that the safety margin is maintained with the insertion of the four GE LUAs of the GE-12 type in Unit 2 Cycle 8. Therefore, the incorporation of these changes will have no impact on current safety margins, nor will they involve a significant reduction in the margin to [of] safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Local Public Document Room location: Osterhout Free Library, Reference Department, 71 South Franklin Street, Wilkes-Barre, Pennsylvania 18701.

Attorney for licensee: Jay Silberg, Esquire, Shaw, Pittman, Potts and Trowbridge, 2300 N Street NW., Washington, DC 20037.

NRC Project Director: John F. Stolz.

Philadelphia Electric Company, Docket Nos. 50-352 and 50-353, Limerick Generating Station, Units 1 and 2, Montgomery County, Pennsylvania

Date of amendment request: December 2, 1994.

Description of amendment request: The proposed change to Limerick Generating Station, Units 1 and 2, Technical Specifications (TS) relocates the TS Fire Protection Requirements to Licensee controlled documents consistent with NRC Generic Letter (GL) 86-10 "Implementation of Fire Protection Requirements," and GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications."

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

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

The proposed changes are administrative in nature and are consistent with NRC GL 86-10 and GL 88-12. Removal of Fire Protection Program (FPP) requirements does not affect any fire protection equipment nor plant equipment important to safety, or involve any physical modifications to plant structures, systems or components, and therefore is not associated with an accident initiator or accident mitigator and can not affect the probability of occurrence of an accident or increase the consequences of an accident. The licensee controlled Technical Requirements Manual (TRM) containing the relocated requirements will be maintained in accordance with TS Section 6.0.

"Administrative Controls" and subject to review in accordance with 10 CFR 50.59. Since future changes to the FPP (i.e., Updated Final Safety Analysis Report and the TRM) will be evaluated per 10 CFR 50.59, no increase (significant or insignificant) in the probability or consequences of an accident previously evaluated will be allowed. Therefore, these 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 changes will not alter the plant configuration (no new or different type of equipment will be installed) or create changes in methods governing normal plant operation that will introduce new failure modes. These changes will not impose different requirements and proper control of information will be maintained. These changes will not alter assumptions made in the safety analysis and licensing basis.

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

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

The proposed changes are administrative in nature and are consistent with NRC GL 86-10 and GL 88-12. The changes will not reduce the margin of safety since they have no impact on any safety analysis assumptions or sequence of events used in any accident analysis. In addition, any future changes to the FPP will be evaluated per the requirements of 10 CFR 50.59. Therefore, the changes do not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Local Public Document Room location: Pottstown Public Library, 500 High Street, Pottstown, Pennsylvania 19464.

Attorney for licensee: J. W. Durham, Sr., Esquire, Sr. V.P. and General Counsel, Philadelphia Electric Company, 2301 Market Street, Philadelphia, Pennsylvania 19101.

NRC Project Director: John F. Stolz.

Philadelphia Electric Company, Docket Nos. 50-352 and 50-353, Limerick Generating Station, Units 1 and 2, Montgomery County, Pennsylvania

Date of amendment request: January 27, 1995.

Description of amendment request: The proposed change to Limerick Generating Station (LGS) Units 1 and 2 Technical Specifications (TS) will eliminate the TS active safety function designation of eight (i.e., four per unit) Drywell Chilled Water System (DCWS) valves.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

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

The proposed changes will eliminate the TS active safety function designation of eight (i.e., four per unit) DCWS valves. The DCWS motor operated valves (MOVs) are designated in TS as Primary Containment Isolation Valves (PCIVs), during operational conditions (OPCONS) 1, 2, and 3, which mitigate the consequences of design basis accidents. The proposed changes will prohibit the subject DCWS valves from opening during OPCONS 1, 2, and 3, thereby,