

**PECO NUCLEAR**

A Unit of PECO Energy

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

March 31, 2000

Docket Nos. 50-277
50-278License Nos. DPR-44
DPR-56U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555Subject: Peach Bottom Atomic Power Station, Units 2 and 3
Additional Information Concerning License Change Application ECR 99-02764Reference: Letter from J. A. Hutton (PECO Energy Company) to U. S. Nuclear Regulatory
Commission, dated February 29, 2000

Dear Sir/Madam:

In the Referenced letter, PECO Energy Company (PECO Energy) submitted License Change Application ECR 99-02764, in accordance with 10 CFR 50.90, requesting a change to the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3 Facility Operating Licenses. This proposed change will add a note to the Completion Time of Condition A for Technical Specification 3.7.2 ("Emergency Service Water (ESW) System and Normal Heat Sink"). This note will provide a one-time extension to the completion time for one Emergency Service Water (ESW) subsystem inoperable from 7 to 14 days. This note will allow the replacement of one ESW pump, currently scheduled to occur in May 2000, and will expire on May 31, 2000.

On Tuesday, March 28, 2000, a conference call was held between the U. S. Nuclear Regulatory Commission and PECO Energy concerning License Change Application ECR 99-02764. As a result of this conversation, attached is additional information concerning this License Change Application.

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

Very truly yours,

James A. Hutton
Director - Licensing

Enclosure: Attachment

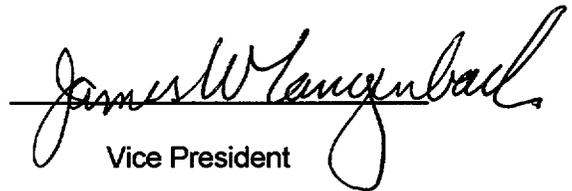
cc: H. J. Miller, Administrator, Region I, USNRC
A. C. McMurtray, USNRC Senior Resident Inspector, PBAPS
R. R. Janati, Commonwealth of Pennsylvania

A001

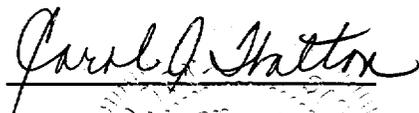
COMMONWEALTH OF PENNSYLVANIA :
 : SS.
COUNTY OF CHESTER :

J. W. Langenbach, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company; the Applicant herein; that he has read the attached information concerning License Change Application ECR 99-02764, for Peach Bottom Facility Operating Licenses DPR-44 and DPR-56, 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.


Vice President

Subscribed and sworn to
before me this *31st* day
of *March* 2000.


Notary Public

Notarial Seal
Carol A. Walton, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires May 28, 2002
Member, Pennsylvania Association of Notaries

ATTACHMENT

**PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3**

**Docket Nos. 50-277
50-278**

**License Nos. DPR-44
DPR-56**

**LICENSE CHANGE APPLICATION
ECR 99-02764**

Additional Information

Supporting Information - 2 Pages

**Additional Information Concerning License Change Application
ECR 99-02764**

Who performed the Certification of the Probabilistic Risk Assessment (PRA) in 1997? Was it done by the BWROG?

The PRA Certification was performed on the 1997 PBAPS PRA model by a BWROG team in the fall of 1998. The BWROG team consisted of six (6) reviewers, three (3) utility and three (3) vendor personnel, with 99 years of combined PRA experience.

Provide some details of your Quality Assurance (QA) process for the PRA. How was the 1999 version QAed?

As part of the 1999 update, specific update tasks were performed by PECO Energy PRA personnel and vendors. A separate individual peer reviewed the work. Integrated evaluations of the revised 1999 models and output were reviewed and calibrated using multiple individuals. Separate unit models were quantified and compared to evaluate known asymmetries between the units. In addition, ORAM-Sentinel runs are periodically compared as a method to verify correct quantification.

What were the major comments of the Certification Team and were they all addressed in the 1999 update?

The Fact and Observations developed by the review team were graded by the team for potential impact on PRA applications. The Fact and Observations that had the potential to quantitatively impact future applications were addressed in the 1999 update. These Facts and Observations, with the resulting changes, can be grouped into broad categories:

- Initiating event frequencies and groups analyzed should be re-examined.
 - ⇒ Better operating experience was reflected in the overall frequency of initiating events.
 - ⇒ Subsumed initiating events (e.g. loss of instrument air, loss of various service waters, etc.) were modeled as separate initiating events.
 - ⇒ The Loss-of-Offsite Power (LOOP) recovery curve was re-evaluated using newer information.
- Human reliability analysis of specific actions known to impact risk should be re-examined.

March 31, 2000

Page 2

- ⇒ Detailed modeling of operator interactions directed by procedures during a LOOP were included.
- The common cause evaluation should be expanded.
 - ⇒ Common cause re-evaluation using the new INEEL database was included.
- Additional plant specific data analysis is desirable.
 - ⇒ Re-assessment of the generic and plant-specific data was performed.

Provide a short description of the Sentinel program and its capabilities. Provide a short description of how the work planners provide insights to the operators on important equipment that is in-service and that is out-of-service including a priority of what should be returned to service first.

ORAM-Sentinel is a PC or LAN based software which uses defense-in-depth methodology and PRA results to provide risk information. It provides the following risk information for each combination for equipment out-of-service: 1) core damage frequency (CDF), 2) a "Remain in Service List" and "Return to Service List", and 3) displays the level of defense-in-depth for key safety functions using the colors green, yellow, orange, and red. ORAM-Sentinel is also used to assess the risk to a given unit prior to removal of equipment from service.

As part of the planning process for a work week, the Work Week Manager (WWM) will identify work and testing that impacts systems or components that are ORAM-Sentinel input terms. These activities are then inputted into ORAM-Sentinel and the program is run. The program then provides the instantaneous CDF value, the "Return to Service List", and the "Remain in Service List". From this information the "On-Line Risk Assessment" sheet for a given work week is developed. This sheet lists the work or tests that have risk significance and the systems with added importance ("Remain in Service List"). This sheet is typically reviewed each day (Monday through Friday) at the 06:30 Plant Status Meeting for the work or testing that is scheduled for that day. It is also typically attached to the Daily Plan which is used by site organizations for daily status updates at the 15:00 meeting. Additionally, an overview of the work week is typically presented at the Wednesday Plant Leadership Meeting the week prior to implementation. In the event of an emergent issue that may impact the overall risk, ORAM-Sentinel would be run and the "Return to Service List" could be used as one of the inputs to assign priorities.