Distribution
Docket
ORB #3
Local PDR
NRC PDR
VStello
GLear
SSheppard
DVerrelli
BGrimes
OI&E (5)
BJones (4)
BScharf (10)
JMcGough
DEisenhut
ACRS (16)
OPA (CMiles)
DRoss
TBAbernathy
JRBuchanan

M. Mendonca
R. Diggs

Docket No. 50-277

MAY 2 2 1978

Philadelphia Electric Company
ATTN: Mr. Edward G. Bauer, Jr., Esquire
Vice President and General Counsel
2301 Market Street
Philadelphia, Pennsylvania 19101

Gentlemen:

The Commission has issued the enclosed Amendment No. 42 to Facility Operating License No. DPR-44 for the Peach Bottom Atomic Power Station, Unit No. 2. The amendment consists of changes to the Technical Specifications in response to your request dated March 21, 1978, as supplemented by your letter dated May 12, 1978.

The amendment will allow a temporary change to the Technical Specifications to permit implementation of a testing program of reactor stability response.

Copies of the Safety Evaluation and the Notice of Issuance are also enclosed.

Sincerely,

Original signed by

George Lear, Chief
Operating Reactors Branch #3
Division of Operating Reactors

Enclosures:
1. Amendment No. 42
2. Safety Evaluation
3. Notice

cc w/enclosures:
See next page

*SEE PREVIOUS YELLOW FOR CONCURRENCES

OFFICE➤	ORB #3	ORB #3	OELD	RS	ORB #3	
SURNAME➤	*SSheppard	*DVerrelli	*Cutchin	*RBaer	GLear GL	
DATE➤	4/5/78	4/5/78	4/13/78	4/5/78	5/22/78	

NRC FORM 318 (9-76) NRCM 0240 ☆ U. S. GOVERNMENT PRINTING OFFICE: 1976 — 626-624

Docket No. 50-277

Distribution
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ORB #3
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George Lear, Chief
Operating Reactors Branch #3
Division of Operating Reactors

Enclosures:
1. Amendment No.
2. Safety Evaluation
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cc w/enclosures:
See next page

Subject to modification of disclaimer in NEDO-24051 as discussed w/ Verrelli
PECO supplemented by letter dated May 12, 1978
DRM

MCT

OFFICE ➤	ORB #3	ORB #3	OELD	ORB #3	RS	
SURNAME ➤	SSheppard	DVerrelli:mjf	CUTCHIN	GLear	Baer	
DATE ➤	4/5/78	4/5/78	4/13/78	4/ /78	4/5/78	

NRC FORM 318 (9-76) NRCM 0240 ☆ U. S. GOVERNMENT PRINTING OFFICE: 1976 — 626-624

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

May 22, 1978

Docket No. 50-277

Philadelphia Electric Company
ATTN: Mr. Edward G. Bauer, Jr., Esquire
Vice President and General Counsel
2301 Market Street
Philadelphia, Pennsylvania 19101

Gentlemen:

The Commission has issued the enclosed Amendment No. 42 to Facility Operating License No. DPR-44 for the Peach Bottom Atomic Power Station, Unit No. 2. The amendment consists of changes to the Technical Specifications in response to your request dated March 21, 1978, as supplemented by your letter dated May 12, 1978.

The amendment will allow a temporary change to the Technical Specifications to permit implementation of a testing program of reactor stability response.

Copies of the Safety Evaluation and the Notice of Issuance are also enclosed.

Sincerely,

George Lear

George Lear, Chief
Operating Reactors Branch #3
Division of Operating Reactors

Enclosures:
1. Amendment No. 42
2. Safety Evaluation
3. Notice

cc w/enclosures:
See next page

cc:

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Philadelphia Electric Company
Assistant General Counsel
2301 Market Street
Philadelphia, Pennsylvania 19101

Troy B. Conner, Jr.
1747 Pennsylvania Avenue, N. W.
Washington, D. C. 20006

Raymond L. Hovis, Esquire
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York, Pennsylvania 17401

Warren K. Rich, Esquire
Assistant Attorney General
Department of Natural Resources
Annapolis, Maryland 21401

Philadelphia Electric Company
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Delta, Pennsylvania 17314

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Pennsylvania State Clearinghouse
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Harrisburg, Pennsylvania 17120

Albert R. Steel, Chairman
Board of Supervisors
Peach Bottom Township
R. D. #1
Delta, Pennsylvania 17314

Chief, Energy Systems Analysis Branch (AW-459)
Office of Radiation Programs
U. S. Environmental Protection Agency
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Washington, D. C. 20460

U. S. Environmental Protection Agency
Region III Office
ATTN: EIS COORDINATOR
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Philadelphia, Pennsylvania 19106

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Generation Division - Nuclear
Philadelphia Electric Company
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Government Publications Section
State Library of Pennsylvania
Education Building
Commonwealth and Walnut Streets
Harrisburg, Pennsylvania 17126

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

PHILADELPHIA ELECTRIC COMPANY
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-277

PEACH BOTTOM ATOMIC POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 42
License No. DPR-44

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Philadelphia Electric Company, et al (the licensee), dated March 21, 1978, 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 a change to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. DPR-44 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 42, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

George Lear

George Lear, Chief
Operating Reactors Branch #3
Division of Operating Reactors

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 22, 1978

ATTACHMENT TO LICENSE AMENDMENT NO. 42

FACILITY OPERATING LICENSE NO. DPR-44

DOCKET NO. 50-277

Replace pages 9, 10, 11, 37, and 73 with the attached revised pages.

SAFETY LIMIT

1.1 FUEL CLADDING INTEGRITY

Applicability:

The Safety Limits established to preserve the fuel cladding integrity apply to those variables which monitor the fuel thermal behavior.

Objective

The objective of the Safety Limits is to establish limits which assure the integrity of the fuel cladding.

Specification:

A. Reactor Pressure $\geq$ 800 psia and Core Flow $\geq$ 10% of Rated

The existence of a minimum critical power ratio MCPR less then 1.06 shall constitute violation of the fuel cladding integrity safety limit.

To ensure that this safety limit is not exceeded, neutron flux shall not be above the scram setting established in specification 2.1.A for longer than 1.15 seconds as indicated by the process computer. When the process computer is out of service this safety limit shall be assumed to be exceeded if the neutron flux exceeds its scram setting and a control rod scram does not occur.

LIMITING SAFETY SYSTEM SETTING

2.1 FUEL CLADDING INTEGRITY

Applicability

The Limiting Safety System Settings apply to trip settings of the instruments and devices which are provided to prevent the fuel cladding integrity Safety Limits from being exceeded.

Objective

The objective of the Limiting Safety System Settings is to define the level of the process variables at which automatic protective action is initiated to prevent the fuel cladding integrity Safety Limits from being exceeded.

Specification:

The limiting safety system settings shall be as specified below:

A. Neutron Flux Scram

1. APRM Flux Scram Trip Setting (Run Mode)

When the Mode Switch is in the RUN position, the APRM flux scram trip setting shall be:

~~$S \leq 0.66W + 54\%$~~

* $S \leq 0.58W + 62\%$

where:

S = Setting in percent of rated thermal power (3293 MWt)

W = Loop recirculating flow rate in percent of rated (rated loop recirculation flow rate equals 34.2×10^6 lb/hr).

* Temporary change which applies only to the stability tests authorized by Amendment No. 42 for Cycle 3.

Amendment No. ~~15~~, ~~34~~, 42

2.1.A (cont'd)

In the event of operation with a maximum total peaking factor (MTPF) greater than the design value of A, the setting shall be modified to the more limiting (lower) of the two values determined by the following:

a. $S \leq (0.66\ W + 54\%) \dfrac{2.63}{\text{MTPF for 7x7 fuel}}$

$*S \leq (0.58\ W + 62\%) \dfrac{2.63}{\text{MTPF for 7x7 fuel}}$

b. $S \leq (0.66\ W + 54\%) \dfrac{2.44}{\text{MTPF for 8x8 fuel}}$

$*S \leq (0.58\ W + 62\%) \dfrac{2.44}{\text{MTPF for 8x8 fuel}}$

MTPF = The value of the existing maximum total peaking factor

A = 2.63 for 7x7 fuel and 2.44 for 8x8 fuel. For no combination of loop recirculation flow rate and core thermal power shall the APRM flux scram trip setting be allowed to exceed 120% of rated thermal power.

*For no combination of loop recirculation flow rate and core thermal power shall the APRM flux scram trip setting be allowed to exceed 90% of rated thermal power.

2. APRM--When the reactor mode switch is in the STARTUP position, the APRM scram shall be set at less than or equal to 15 percent of rated power.

3. IRM--The IRM scram shall be set at less than or equal to 120/125 of full scale.

4. When the reactor mode switch is in STARTUP or RUN, the reactor shall not be operated in natural circulation flow mode.

*Temporary change which applies only to the stability tests authorized by Amendment No. 42 for Cycle 3

SAFETY LIMIT

B. Core Thermal Power Limit (Reactor Pressure ≤ 800 psia)

When the reactor pressure is ≤ 800 psia or core flow is less than 10% of rated, the core thermal power shall not exceed 25% of rated thermal power.

C. Whenever the reactor is in the shutdown condition with irradiated fuel in the reactor vessel, the water level shall not be less than 17.7 in. above the top of the normal active fuel zone.

*Temporary change which applies only to the stability tests authorized by Amendment No. 42 for Cycle 3.

Amendment No. ~~23~~, ~~34~~, 42

LIMITING SAFETY SYSTEM SETTING

B. APRM Rod Block Trip Setting

S_{RB} _ 0.66 + 42%

*S_{RB} _ 0.58 + 50%

where:

S_{RB} = Rod block setting in percent of rated thermal power (3293 MWt)

W = Loop recirculation flow rate in percent of rated (rated loop recirculation flow rate equals 34.2×10^6 lb/hr).

In the event of operation with a maximum total peaking factor (MTPF) greater than the design value of A, the setting shall be modified to the more limiting of the 2 values determined by the following:

1. S_{RB} _(0.66 W + 42%) $\frac{2.63}{\text{MTPF for 7x7 fuel}}$

   *S_{RB} _(0.58 W + 50%) $\frac{2.63}{\text{MTPF for 7x7 fuel}}$

2. S_{RB} _(0.66 W + 42%) $\frac{2.44}{\text{MTPF for 8x8 fuel}}$

   *S_{RB} _(0.58 W + 50%) $\frac{2.44}{\text{MTPF for 8x8 fuel}}$

MTPF = The value of the existing maximum total peaking factor

A = 2.63 for 7x7 fuel and 2.44 for 8x8 fuel.

C. Scram and isolation-- reactor low water level ≥538 in. above vessel zero (0" on level instruments)

D. Scram--turbine stop ≤10 percent valve closure

E. Scram--turbine control valve fast closure on loss of control oil pressure 500<P<850 psig.

Amendment No. 28, 34, 42

Table 3.1.1

REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENTATION REQUIREMENT

Minimum No. of Operable Instrument Channels per Trip System (1)	Trip Function	Trip Level Setting	Modes in Which Function Must be Operable			Number of Instrument Channels Provided by Design	Action (1)
			Refuel (7)	Startup	Run		
1	Mode Switch In Shutdown		X	X	X	1 Mode Switch (4 Sections)	A
1	Manual Scram		X	X	X	2 Instrument Channels	A
3	IRM High Flux	≤120/125 of Full Scale	X	X	(5)	8 Instrument Channels	A
3	IRM Inoperative		X	X	(5)	8 Instrument Channels	A
2	APRM High Flux	(.66W+54) (A/MTPF) (12)(13)			X	6 Instrument Channels	A or B
		*(0.58W + 62) (A/MTPF) (12)(13)			X	6 Instrument Channels	A or B
2	APRM Inoperative	(11)	X	X	X	6 Instrument Channels	A or B
2	APRM Downscale	≥2.5 Indicated on Scale			(10)	6 Instrument Channels	A or B
2	APRM High Flux in Startup	≤15% Power	X	X		6 Instrument Channels	A
2	High Reactor Pressure	≤1055 psig	X (9)	X	X	4 Instrument Channels	A
2	High Drywell Pressure	≤2 psig	X (8)	X (8)	X	4 Instrument Channels	A
2	Reactor Low Water Level	≥0 in. Indicated Level	X	X	X	4 Instrument Channels	A

*Temporary change which applies only to the stability tests authorized by Amendment No. 42 for Cycle 3.

Amendment No. 23, 34, 42

TABLE 3.2.C

INSTRUMENTATION THAT INITIATES CONTROL ROD BLOCKS

Minimum No. of Operable Instrument Channels Per Trip System	Instrument	Trip Level Setting	Number of Instrument Channels Provided by Design	Action
2	APRM Upscale (Flow Biased)	$\leq [0.66\ W + 42]\left(\frac{A}{MTPF}\right)$ (2)	6 Inst. Channels	(1)
* 2	APRM Upscale (Flow Biased)	$\leq [0.58\ W + 50]\left(\frac{A}{MTPF}\right)$ (2)	6 Inst. Channels	(1)
2	APRM Upscale (Startup Mode)	$\leq$ 12%	6 Inst. Channels	(1)
2	APRM Downscale	$\geq$ 2.5 indicated on scale	6 Inst. Channels	(1)
1 (7)	Rod Block Monitor (Flow Biased)	$\leq [0.66W + 41]\left(\frac{A}{MTPF}\right)$ (2)	2 Inst. Channels	(1)
* 1 (7)	Rod Block Monitor (Flow Biased)	$\leq [0.58\ W + 50]\left(\frac{A}{MTPF}\right)$ (2)	2 Inst. Channels	(1)
1 (7)	Rod Block Monitor Downscale	$\geq$ 2.5 indicated on scale	2 Inst. Channels	(1)
3	IRM Downscale (3)	$\geq$ 2.5 indicated on scale	8 Inst. Channels	(1)
3	IRM Detector not in Startup Position	(8)	8 Inst. Channels	(1)
3	IRM Upscale	$\leq$ 108 indicated on scale	8 Inst. Channels	(1)
2 (5)	SRM Detector not in Startup Position	(4)	4 Inst. Channels	(1)
2 (5) (6)	SRM Upscale	$\leq 10^5$ counts/sec.	4 Inst. Channels	(1)

*Temporary change which applies only to the stability tests authorized by Amendment No. 42 for Cycle 3.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 42 TO FACILITY LICENSE NO. DPR-44

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION

UNIT NO. 2

DOCKET NO. 50-277

Introduction

By application for license amendment dated March 21, 1978(1) as supplemented by letter dated May 12, 1978(2) the Philadelphia Electric Company (PECO) requested temporary changes to Peach Bottom Atomic Power Station, Unit No. 2 (PC-2) Technical Specifications. These requested changes would provide revised safety limit settings for a proposed stability program. These tests will be used for the verification and future development of the stability analytical methods.

Evaluation

Up to four stability test series will be conducted, each of which will consist of up to three test points (designated PT1, PT2 and PT3) at or as close as possible to the following conditions:

1. at minimum recirculation pump speed and with a rod pattern for rated power at rated core flow (PT2);

2. at minimum recirculation pump speed and at the maximum allowable power level with the repositioned rod block power setpoint (PT3); and

3. at minimum recirculation pump speed and at a reduced power level (PT1).

Each of the test series will be performed at a different exposure level to determine the variation of stability characteristics throughout a fuel cycle. Consideration will be given to plant availability for performance of each test series, e.g., tests will be conducted during normal rod swap maneuvering. Therefore, the tests program will be flexible to allow the maximum amount of data to be gathered during periods of low power operation within the constraints of power requirements for the plants.

Test point PT3 was specified because it is as close to the design reference condition for BWR core stability analysis as can be readily achieved. Relative stability margin of the reactor core at this condition will then be determined and compared to the present design method calculations. The other two test conditions were designated so that the sensitivity of core power, as close to the natural circulation power-flow line as practicable, could be determined. The initial test point will be PT2 and the results at that point compared with predictions, before proceeding to test point PT3, which is the least stable. The data from the final test point (PT1) will be used to determine the shape of the decay ratio line along the minimum flow line.

Small perturbations will be introduced into the reactor core power void dynamic feedback loop in the form of pressure disturbances generated from a series of pressure regulator setpoint step inputs. These step inputs will be generated from a relay contact closure on a test card in the Electric-Hydraulic Control (EHC) turbine control cabinet which is utilized for plant startup testing. Pressure setpoint disturbances will be introduced as a series of repeated step changes of approximately 10 psi amplitude. Each stability test will consist of runs incorporating randomly switched setpoint step sequences which last approximately 30 minutes at each test point. Approximately one hour of steady-state data will also be taken at each point.

Before the tests are conducted, the stability at actual test conditions for each of the finally selected test points will be predicted using the models documented in Reference 3. The relative stability of the core (as measured by the APRM signal) will be analyzed after completion of each test. These experimental results for test point PT2 will be used to correct the pre-test calculated decay ratio of test point PT3. If this corrected decay ratio is less than 1.0, the test at point PT3 will be conducted. Corrected decay ratios greater than or equal to 1.0 will result in re-evaluation of the stability test point and either deletion of the test at point PT3 or changing to a more stable (lower power) condition. To avoid exciting a resonant response in the reactor process control systems during the pressure setpoint disturbance tests, the decay ratio in the plant control responses for each test condition must be less than 1.0 for any variable that exhibits an oscillatory response to the pressure changes before proceeding to the next test condition. We find this criterion acceptable for the proposed test program.

To conduct the proposed tests, several temporary changes must be made to the Peach Bottom-2 Technical Specifications. Before the stability tests are conducted, a readjustment to the slope of the APRM scram and rod block lines (T.S. 2.1.A and Table 3.1.1 for scram lines and 2.1.B and Table 3.2.C for rod block lines) is required to operate at the selected end of the rated power-flow control line test condition PT2, and to reach test condition PT3, above the power-flow control line.

Proposed interim APRM scram and rod block settings are based on the settings used for the stability tests conducted at Peach Bottom Unit 2 in April 1977. Setting the slope of the rod block line also sets the slope of the flow referenced scram line. The position of the flow referenced scram line is raised enough to allow pressure perturbation testing without causing the reactor to scram from high neutron flux. In order to provide added protection for the plant at intermediate core flow, the maximum APRM scram point is lowered from 120% to 90% of rated power. These temporary specifications are more restrictive than those currently approved for routine operation and need only to be applied during the conduct of the stability tests authorized by this amendment. Therefore, there is no decrease in safety margin from that which currently exists for Cycle 3 operation.

To implement the above Technical Specification change, it is proposed that the reactor power be reduced by flow control to the first test point (PT2). The flow-biased APRM scram and rod block lines and the maximum APRM scram point will be adjusted and three stability tests (PT2, PT3, and PT1) will be conducted. Following test PT3, the power will be reduced below the rated rod line, and test PT1 will be conducted. Following test PT1, the rod block curves, scram curves and the maximum APRM scram point will be returned to their original values.

These changes to the APRM rod block and high flux scram settings have been previously accepted[5] on the basis that (1) any transient from the proposed test conditions would not result in more severe consequences than the transients which are currently limiting and (2) the probability of occurrence of any transient is not increased. The staff has reviewed the current proposal and agrees with these conclusions. On this basis we find the changes to the Technical Specifications to be acceptable.

Environmental Considerations

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and pursuant to 10 CFR §51.5(d)(4) that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the change does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: May 22, 1978

REFERENCES

1. Letter from E. J. Bradlay (PECO) to Director of Nuclear Reactor Regulation (NRC), March 21, 1978.

2. Letter from E. J. Bradley (PECO) to Director of Nuclear Reactor Regulation (NRC), May 12, 1978.

3. "Stability and Dynamic Performance of the General Electric Boiling Water Reactor," January 1977 (NECO-21506).

4. "General Electric Boiling Water Reactor Reload No. 2 Licensing Amendment for Peach Bottom Atomic Power Station Unit 2," February 1977 (NECO-21578).

5. Letter from G. Lear (NRC) to E. G. Bauer (PECO) dated April 4, 1977.

UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKET NO. 50-277

PHILADELPHIA ELECTRIC COMPANY, ET AL

NOTICE OF ISSUANCE OF AMENDMENT TO FACILITY OPERATING LICENSE

The U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 42 to Facility Operating License No. DPR-44 issued to Philadelphia Electric Company, Public Service Electric and Gas Company, Delmarva Power and Light Company, and Atlantic City Electric Company, which revised Technical Specifications for operation of the Peach Bottom Atomic Power Station, Unit No. 2. The amendment is effective as of its date of issuance.

The amendment consists of temporary changes to the Technical Specifications which will allow implementation of a testing program of reactor stability response. During the tests compensatory changes will be made that will assure that reactor safety margins will be the same as those established by transient and accident analyses for cycle 3 operation.

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment. Prior public notice of this amendment was not required since the amendment does not involve a significant hazards consideration.

The Commission has determined that the issuance of this amendment will not result in any significant environmental impact and that pursuant to 10 CFR §51.5(d)(4) an environmental impact statement, negative declaration or environmental impact appraisal need not be prepared in connection with issuance of this amendment.

For further details with respect to this action, see (1) the application for amendment dated March 21, 1978, as supplemented by letter dated May 12, 1978, (2) Amendment No. 42 to License No. DPR-44, and (3) the Commission's related Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N. W., Washington, D. C. and at the Government Publications Section, State Library of Pennsylvania, Education Building, Commonwealth and Walnut Streets, Harrisburg, Pennsylvania 17126. A copy of items (2) and (3) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Operating Reactors.

Dated at Bethesda, Maryland, this 22nd day of May 1978.

FOR THE NUCLEAR REGULATORY COMMISSION

George Lear

George Lear, Chief
Operating Reactors Branch #3
Division of Operating Reactors