December 4, 1989

Dockets Nos. 50-277/278

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RClark	JCalvo	
MO'Brien(2)	GSuh (2)	

Mr. George A. Hunger, Jr.
Director-Licensing, MC 5-2A-5
Philadelphia Electric Company
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Hunger:

SUBJECT: DELETION OF ROD SEQUENCE CONTROL SYSTEM AND LOWERING ROD WORTH MINIMIZER LOW POWER SETPOINT TO 10 PERCENT (TAC NOS. 74172 AND 74173)

RE: PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3

The Commission has issued the enclosed Amendment Nos. 151 and 153 to Facility Operating License Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3, respectively. This amendment consists of changes to the Technical Specifications (TS) in response to your application dated July 19, 1989, as supplemented by a November 14, 1989 letter.

These amendments change the TS to permit removal of the rod sequence control system, and reduce the rod worth minimizer low power setpoint.

A copy of the Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's Bi-Weekly Federal Register Notice.

Sincerely,

/S/

E. H. Trottier, Project Manager
Project Directorate I-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 151 to DPR-44
2. Amendment No. 153 to DPR-56
3. Safety Evaluation

DFO1
1/1

cc w/enclosures:
See next page

[74172 LETTER]

PDI-2/LA	PDI-2/PM	PDI-2/PM	OGC	PDI-2/D
MO'Brien	ETrottier:tr	GSuh		WButler
12/4/89	11/22/89	11/22/89	11/29/89	12/4/89

8912130391 891204
PDR ADOCK 05000277
P PDC

CP-1

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 151 , are hereby incorporated in the license. PECO shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION

/S/

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: December 4, 1989

PDI-2/LA	PDI-2/PM	PDI-2/PM	OGC	PDI-2/D
MO'Brien	ETrottier	GSuh		WButler
12/4/89	11/22/89	11/22/89	11/29/89	12/4/89

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FOR THE NUCLEAR REGULATORY COMMISSION

/S/

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

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Changes to the Technical
Specifications

Date of Issuance: December 4, 1989

PDI-2/LA	PDI-2/PM	PDI-2/PM	OGC	PDI-2/D
MO'Brien	ETrottier	GSuh		WButler
12/ /89	11/22/89	11/22/89	11/29/89	12/4/89

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

December 4, 1989

Dockets Nos. 50-277/278

Mr. George A. Hunger, Jr.
Director-Licensing, MC 5-2A-5
Philadelphia Electric Company
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Hunger:

SUBJECT: DELETION OF ROD SEQUENCE CONTROL SYSTEM AND LOWERING ROD WORTH MINIMIZER LOW POWER SETPOINT TO 10 PERCENT (TAC NOS. 74172 AND 74173)

RE: PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3

The Commission has issued the enclosed Amendment Nos. 151 and 153 to Facility Operating License Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3, respectively. This amendment consists of changes to the Technical Specifications (TS) in response to your application dated July 19, 1989, as supplemented by a November 14, 1989 letter.

These amendments change the TS to permit removal of the rod sequence control system, and reduce the rod worth minimizer low power setpoint.

A copy of the Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's Bi-Weekly Federal Register Notice.

Sincerely,

E. H. Trottier, Project Manager
Project Directorate I-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 151 to DPR-44
2. Amendment No. 153 to DPR-56
3. Safety Evaluation

cc w/enclosures:
See next page

Mr. George A. Hunger, Jr.
Philadelphia Electric Company

Peach Bottom Atomic Power Station,
Units 2 and 3

cc:

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Board of Supervisors
Peach Bottom Township
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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. 151
License No. DPR-44

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

   A. The application for amendment by Philadelphia Electric Company, (the licensee) dated July 19, 1989, as supplemented by a November 14, 1989 letter, 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. 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. 151 , are hereby incorporated in the license. PECO shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION

Walter R. Butler

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: December 4, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 151

FACILITY OPERATING LICENSE NO. DPR-44

DOCKET NO. 50-277

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

Remove	Insert
19	19
99	99
100	100
101	101
102	102
102a	102a
107	107
108	108
109	109

2.1.A BASES (Cont'd.)

An increase in the APRM scram trip setting would decrease the margin present before the fuel cladding integrity Safety Limit is reached. The APRM scram trip setting was determined by an analysis of margins required to provide a reasonable range for maneuvering during operation. Reducing this operating margin would increase the frequency of spurious scrams which have an adverse effect on reactor safety because of the resulting thermal stresses. Thus, the APRM scram trip setting was selected because it provides adequate margin for the fuel cladding integrity Safety Limit yet allows operating margin that reduces the possibility of unnecessary scrams.

The scram trip setting must be adjusted to assure that the LHGR transient peak is not increased for any combination of maximum fraction of limiting power density (MFLPD) and reactor core thermal power. The scram setting is adjusted in accordance with the formula in Specification 2.1.A.1, when the MFLPD is greater than the fraction of rated power (FRP).

Analyses of the limiting transients show that no scram adjustment is required to assure MCPR greater than the fuel cladding integrity safety limit when the transient is initiated from MCPR greater than the operating limit given in Specification 3.5.K.

For operation in the startup mode while the reactor is at low pressure, the APRM scram setting of 15 percent of rated power provides adequate thermal margin between the setpoint and the Safety Limit, 25 percent of rated. The margin is adequate to accommodate anticipated maneuvers associated with power plant startup. Effects of increasing pressure at zero or low void content are minor, cold water from sources available during startup is not much colder than that already in the system, temperature coefficients are small, and control rod patterns are constrained to be uniform by operating procedures backed up by the Rod Worth Minimizer. Worth of individual rods is very low in a uniform rod pattern. Thus, of all possible sources of reactivity input, uniform control rod withdrawal is the most probable cause of significant power rise. Because the flux distribution associated with uniform rod withdrawals does not involve high local peaks, and because several rods must be moved to change power by a significant percentage of rated power, the rate of change of power is very slow. Generally, the heat flux is in near equilibrium with the fission rate. In an assumed uniform rod withdrawal approach to the scram level, the rate of power rise is no more than 5 percent of rated power per minute, and the APRM system would be more than adequate to assure a scram before the power could exceed the Safety Limit. The 15 percent APRM scram remains active until the mode switch is placed in the RUN position. This switch occurs when the reactor pressure is greater than 850 psig.

LIMITING CONDITIONS FOR OPERATION

3.3 REACTIVITY CONTROL

Applicability:

Applies to the operational status of the control rod system.

Objective:

To assure the ability of the control rod system to control reactivity.

Specification:

A. Reactivity Limitations

1. Reactivity margin - core loading

A sufficient number of control rods shall be operable so that the core could be made subcritical in the most reactive condition during the operating cycle with the strongest control rod fully withdrawn and all other operable control rods fully inserted.

2. Reactivity margin - inoperable control rods

a. Control rods which cannot be moved with control rod drive pressure shall be considered inoperable.

If a partially or fully withdrawn control rod drive cannot be moved with drive or scram pressure the reactor shall be brought to a shutdown condition within 48 hours unless

SURVEILLANCE REQUIREMENTS

4.3 REACTIVITY CONTROL

Applicability:

Applies to the surveillance requirements of the control rod system.

Objective:

To verify the ability of the control rod system to control reactivity.

Specification:

A. Reactivity Limitations

1. Reactivity margin - core loading

Sufficient control rods shall be withdrawn following a refueling outage when core alterations were performed to demonstrate with a margin of 0.38%Δk/k that the core can be made subcritical at any time in the subsequent fuel cycle with the analytically determined strongest operable control rod fully withdrawn and all other operable rods fully inserted.

2. Reactivity margin - inoperable control rods

a. Each partially or fully withdrawn operable control rod shall be exercised one notch at least once each week when operating above the RWM low power setpoint. Each partially or fully withdrawn operable control rod shall be exercised at least one notch at least every 24 hours when operating above the RWM low power setpoint if there are three

LIMITING CONDITIONS FOR OPERATION

3.3.A Reactivity Limitations (Cont'd)

investigation demonstrates that the cause of the failure is not due to a failed control rod drive mechanism collet housing.

b. The control rod directional control valves for inoperable control rods shall be disarmed electrically and the control rods shall be in such positions that Specification 3.3.A.1 is met.

c. Control rods with scram times greater than those permitted by Specification 3.3.C.3 are inoperable, but if they can be inserted with control rod drive pressure they need not be disarmed electrically.

d. Deleted.

e. Control rods with inoperable accumulators or those whose position cannot be positively determined shall be considered inoperable.

SURVEILLANCE REQUIREMENTS

4.3.A Reactivity Limitations (Cont'd)

or more inoperable control rods or when operating above the RWM low power setpoint if there is one fully or partially withdrawn rod which cannot be moved and for which control rod drive mechanism damage has not been ruled out. The surveillance need not be completed within 24 hours if the number of inoperable rods has been reduced to less than 3 and if it has been demonstrated that control rod drive mechanism collet housing failure is not the cause of an immovable control rod.

b. The scram discharge volume drain and vent valves shall be verified open at least once per month. These valves may be closed intermittently for testing.

c. At least once every 3 months verify that the scram discharge volume drain and vent valves closed within 15 seconds after receipt of a closure signal, and reopen upon reset of the closure signal.

d. Deleted.

LIMITING CONDITIONS FOR OPERATION

3.3.A Reactivity Limitations (Cont'd)

f. Inoperable controls rods shall be positioned such that Specification 3.3.A.1 is met. In addition, during reactor power operation, no more than one control rod in any 5 x 5 array may be inoperable (at least 4 operable control rods must separate any 2 inoperable ones). If this Specification cannot be met the reactor shall not be started, or if at power, the reactor shall be brought to a cold shutdown condition within 24 hours.

B. Control Rods

1. Each control rod shall be coupled to its drive or completely inserted and the control rod directional control valves disarmed electrically. This requirement does not apply in the refuel condition when the reactor is vented. Two control rod drives may be removed as long as Specification 3.3.A.1 is met.

SURVEILLANCE REQUIREMENTS

4.3.A Reactivity Limitations (Cont'd)

B. Control Rods

1. The coupling integrity shall be verified for each withdrawn control rod as follows:

   a. When a rod is withdrawn the first time after each refueling outage or after maintenance, observe discernible response of the nuclear instrumentation and rod position indication for the "full-in" and "full-out" position. However, for initial rods when response is not discernible, subsequent exercising of these rods after the reactor is above the Rod Worth Minimizer low power setpoint shall be performed to verify instrumentation response.

   b. When the rod is fully withdrawn the first time after each refueling outage or after maintenance observe that the drive does not go to the overtravel position.

LIMITING CONDITIONS FOR OPERATION

3.3.B Control Rods (Cont'd)

2. The control rod drive housing support system shall be in place during reactor power operation or when the reactor coolant system is pressurized above atmospheric pressure with fuel in the reactor vessel, unless all control rods are fully inserted and Specification 3.3.A.1 is met.

3. a. Deleted.

   b. The Rod Worth Minimizer (RWM) low power setpoint is greater than or equal to 10% of rated power. Whenever the reactor is in the startup or run modes with thermal power less than or equal to the Rod Worth Minimizer (RWM) low power setpoint the Rod Worth Minimizer shall be operable except as follows:

   1. With the RWM inoperable after the first 12 control rods are fully withdrawn, operation may continue provided that control rod movement and compliance with the prescribed control rod pattern are verified by a second licensed operator or technically qualified member of the station technical staff.

SURVEILLANCE REQUIREMENTS

4.3.B Control Rods (Cont'd)

c. During each refueling outage and after control rod maintenance, observe that the drive does not go to the overtravel position.

2. The control rod drive housing support system shall be inspected after reassembly and the results of the Inspection recorded.

3. a. Deleted.

   b. 1. Prior to the start of control rod withdrawal towards criticality and prior to attaining the Rod Worth Minimizer low power setpoint during rod insertion at shutdown, the Rod Worth Minimizer (RWM) shall be demonstrated to be operable by the following checks:

      a. The RWM computer on line diagnostic test shall be successfully performed.

      b. Prior to the start of control rod withdrawal only, proper annunciation of the selection error of at least one out-of-sequence control rod in a fully inserted group shall be verified.

LIMITING CONDITIONS FOR OPERATION

3.3.B Control Rods (Cont'd)

2. With the RWM inoperable before the first 12 control rods are fully withdrawn, one startup per calendar year may be performed provided that control rod movement and compliance with the prescribed control rod pattern are verified by a second licensed operator or technically qualified member of the station technical staff.

3. Otherwise, with the RWM inoperable, control rod withdrawal movement shall not be permitted except by full scram. Control rods may be moved, under administrative control to permit testing associated with demonstrating operability of the RWM.

c. Deleted.

SURVEILLANCE REQUIREMENTS

4.3.B Control Rods (Cont'd)

c. The rod block function of the RWM shall be verified by withdrawing the first rod during start-up only as an out-of-sequence control rod no more than to the block point.

2. Following any loading of the rod worth minimizer sequence program into the computer, the correctness of the control rod withdrawal sequence input to the RWM computer shall be verified.

c. When required, the presence of the second licensed operator or technically qualified member of the station technical staff to verify the following of the correct rod program shall be verified and recorded.

3.3.A and 4.3.A BASES (Cont'd)

Studies have been made which compare experimental criticals with calculated criticals. These studies have shown that actual criticals can be predicted within a given tolerance band. For gadolinia cores the additional margin required due to control cell material manufacturing tolerances and calculational uncertainties has experimentally been determined to be 0.38% $\Delta k/k$. When this additional margin is demonstrated, it assures that the reactivity control requirement is met.

2. Reactivity Margin - Inoperable Control Rods

Specification 3.3.A.2 requires that a rod be taken out of service if it cannot be moved with drive pressure. If the rod is fully inserted and then disarmed electrically*, it is in a safe position of maximum contribution to shut down reactivity. If it is disarmed electrically in a non-fully inserted position, that position shall be consistent with the shutdown reactivity limitation stated in Specification 3.3.A.1. This assures that the core can be shutdown at all times with the remaining control rods assuming the strongest operable control rod does not insert. Inoperable bypassed rods will be limited within any group to not more than one control rod of a (5x5) twenty-five control rod array. Also if damage within the control rod drive mechanism and in particular, cracks in drive internal housings, cannot be ruled out, then a generic problem affecting a number of drives cannot be ruled out. Circumferential cracks resulting from stress assisted intergranular corrosion have occurred in the collet housing of drives at several BWRs. This type of cracking could occur in a number of drives and if the cracks propagated until severance of the collet housing occurred, scram could be prevented in the affected rods. Limiting the period of operation with a potentially severed rod and requiring increased surveillance after detecting one stuck rod will assure that the reactor will not be operated with a large number of rods with failed collet housings.

*To disarm the drive electrically, four Amphenol type plug connectors are removed from the drive insert and withdrawal solenoids rendering the rod incapable of withdrawal. This procedure is equivalent to valving out the drive and is preferred because, in this condition, drive water cools and minimizes crud accumulation in the drive. Electrical disarming does not eliminate position indication.

3.3 and 4.3 BASES (Cont'd)

B. Control Rods

1. Control rod dropout accidents as discussed in the FSAR can lead to significant core damage. If coupling integrity is maintained, the possibility of a rod drop-out accident is eliminated. The overtravel position feature provides a positive check as only uncoupled drives may reach this position. Neutron instrumentation response to rod movement provides a verification that the rod is following its drive. Absence of such response to drive movement could indicate an uncoupled condition. Rod position indication is required for proper function of the rod worth minimizer (RWM).

2. The control rod housing support restricts the outward movement of a control rod to less than 3 inches in the extremely remote event of a housing failure. The amount of reactivity which could be added by this small amount of rod with-drawal, which is less than a normal single withdrawal increment, will not con-tribute to any damage to the primary coolant system. The design basis is given in subsection 3.5.2 of the FSAR and the safety evaluation is given in subsection 3.5.4. This support is not required if the reactor coolant system is at atmos-pheric pressure since there would then be no driving force to rapidly eject a drive housing. Additionally, the support is not required if all control rods are fully inserted and if an adequate shutdown margin with one control rod with-drawn has been demonstrated, since the reactor would remain subcritical even in the event of complete ejection of the strongest control rod.

3. The Rod Worth Minimizer (RWM) restricts withdrawals and insertions of control rods to prespecified sequences. All patterns associated with these restrictions have the characteristic that, assuming the worst single deviation from the restrictions, the drop of any control rod from the fully inserted position to the position of the control rod drive would not cause the reactor to sustain a power excursion resulting in the peak enthalpy of any pellet exceeding 280 calories per gram. An enthalpy of 280 calories per gram is well below the level at which rapid fuel dispersal could occur (i.e., 425 calories per gram). Primary system damage in this accident is not possible unless a significant amount of fuel is rapidly dispersed. Ref. Sections 3.6.6, 14.6.2 and 7.16.3.3 of the FSAR, NEDO-10527 and supplements thereto, and NEDE-24011-P-A.

3.3.B and 4.3.B BASES (Cont'd)

In performing the function described above, the RWM is not needed to impose any restrictions at core power levels in excess of 10 percent of rated power. Material in the cited references shows that it is impossible to reach 280 calories per gram in the event of a control rod drop occurring at a power level greater than 10 percent, regardless of the rod pattern. This is true for all normal and abnormal patterns, including those which maximize individual control rod worth.

The Rod Worth Minimizer provides automatic supervision to assure that out-of-sequence control rods will not be withdrawn or inserted; i.e., the RWM system limits operator deviations from planned control rod movement. The RWM is an important system for minimizing the consequences of an RDA below 10% power. The RWM is therefore required to be operable for all but one startup per year before the first twelve control rods are fully withdrawn. One startup per year before the first twelve control rods are fully withdrawn will be permitted with the RWM inoperable provided control rod movement and compliance with the prescribed control rod pattern are verified by a second licensed operator or technically qualified member of the station technical staff. The function of the RWM makes it unnecessary to specify a license limit on rod worth to preclude unacceptable consequences in the event of a control rod drop. At power levels below 10 percent of rated, the RWM forces adherence to acceptable rod patterns. Above 10 percent of rated power, no constraint on rod pattern is required to assure that rod drop accident consequences are acceptable. Control rod pattern constraints above 10 percent of rated power are imposed by power distribution requirements as defined in Section 3.5/4.5 of the Technical Specifications.

4. The Source Range Monitor (SRM) system performs no automatic safety system function; i.e., it has no scram function. It does provide the operator with a visual indication of neutron level. The consequences of reactivity accidents are functions of the initial neutron flux.

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. 50-278

PEACH BOTTOM ATOMIC POWER STATION, UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 153
License No. DPR-56

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

   A. The application for amendment by Philadelphia Electric Company, et al. (the licensee) dated July 19, 1989, as supplemented by a November 14, 1989 letter, 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. DPR-56 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 153 , are hereby incorporated in the license. PECO shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION

Walter R. Butler

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: December 4, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 153

FACILITY OPERATING LICENSE NO. DPR-56

DOCKET NO. 50-278

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

Remove	Insert
19	19
99	99
100	100
101	101
102	102
102a	102a
107	107
108	108
109	109

2.1.A <u>BASES</u> (Cont'd.)

An increase in the APRM scram trip setting would decrease the margin present before the fuel cladding integrity Safety Limit is reached. The APRM scram trip setting was determined by an analysis of margins required to provide a reasonable range for maneuvering during operation. Reducing this operating margin would increase the frequency of spurious scrams which have an adverse effect on reactor safety because of the resulting thermal stresses. Thus, the APRM scram trip setting was selected because it provides adequate margin for the fuel cladding integrity Safety Limit yet allows operating margin that reduces the possibility of unnecessary scrams.

The scram trip setting must be adjusted to assure that the LHGR transient peak is not increased for any combination of maximum fraction of limiting power density (MFLPD) and reactor core thermal power. The scram setting is adjusted in accordance with the formula in Specification 2.1.A.1, when the MFLPD is greater than the fraction of rated power (FRP).

Analyses of the limiting transients show that no scram adjustment is required to assure MCPR greater than the fuel cladding integrity safety limit when the transient is initiated from MCPR greater than the operating limit given in Specification 3.5.K.

For operation in the startup mode while the reactor is at low pressure, the APRM scram setting of 15 percent of rated power provides adequate thermal margin between the setpoint and the Safety Limit, 25 percent of rated. The margin is adequate to accommodate anticipated maneuvers associated with power plant startup. Effects of increasing pressure at zero or low void content are minor, cold water from sources available during startup is not much colder than that already in the system, temperature coefficients are small, and control rod patterns are constrained to be uniform by operating procedures backed up by the Rod Worth Minimizer. Worth of individual rods is very low in a uniform rod pattern. Thus, of all possible sources of reactivity input, uniform control rod withdrawal is the most probable cause of significant power rise. Because the flux distribution associated with uniform rod withdrawals does not involve high local peaks, and because several rods must be moved to change power by a significant percentage of rated power, the rate of change of power is very slow. Generally, the heat flux is in near equilibrium with the fission rate. In an assumed uniform rod withdrawal approach to the scram level, the rate of power rise is no more than 5 percent of rated power per minute, and the APRM system would be more than adequate to assure a scram before the power could exceed the Safety Limit. The 15 percent APRM scram remains active until the mode switch is placed in the RUN position. This switch occurs when the reactor pressure is greater than 850 psig.

LIMITING CONDITIONS FOR OPERATION

3.3 REACTIVITY CONTROL

Applicability:

Applies to the operational status of the control rod system.

Objective:

To assure the ability of the control rod system to control reactivity.

Specification:

A. Reactivity Limitations

1. Reactivity margin - core loading

A sufficient number of control rods shall be operable so that the core could be made subcritical in the most reactive condition during the operating cycle with the strongest control rod fully withdrawn and all other operable control rods fully inserted.

2. Reactivity margin - inoperable control rods

a. Control rods which cannot be moved with control rod drive pressure shall be considered inoperable.

If a partially or fully withdrawn control rod drive cannot be moved with drive or scram pressure the reactor shall be brought to a shutdown condition within 48 hours unless

SURVEILLANCE REQUIREMENTS

4.3 REACTIVITY CONTROL

Applicability:

Applies to the surveillance requirements of the control rod system.

Objective:

To verify the ability of the control rod system to control reactivity.

Specification:

A. Reactivity Limitations

1. Reactivity margin - core loading

Sufficient control rods shall be withdrawn following a refueling outage when core alterations were performed to demonstrate with a margin of 0.38%Δk/k that the core can be made subcritical at any time in the subsequent fuel cycle with the analytically determined strongest operable control rod fully withdrawn and all other operable rods fully inserted.

2. Reactivity margin - inoperable control rods

a. Each partially or fully withdrawn operable control rod shall be exercised one notch at least once each week when operating above the RWM low power setpoint. Each partially or fully withdrawn operable control rod shall be exercised at least one notch at least every 24 hours when operating above the RWM low power setpoint if there are three or more

LIMITING CONDITIONS FOR OPERATION

3.3.A Reactivity Limitations (Cont'd)

investigation demonstrates that the cause of the failure is not due to a failed control rod drive mechanism collet housing.

b. The control rod directional control valves for inoperable control rods shall be disarmed electrically and the control rods shall be in such positions that Specification 3.3.A.1 is met.

c. Control rods with scram times greater than those permitted by Specification 3.3.C.3 are inoperable, but if they can be inserted with control rod drive pressure they need not be disarmed electrically.

d. Deleted.

e. Control rods with inoperable accumulators or those whose position cannot be positively determined shall be considered inoperable.

SURVEILLANCE REQUIREMENTS

4.3.A Reactivity Limitations (Cont'd)

inoperable control rods or or when operating above the RWM low power setpoint if there is one fully or partially withdrawn rod which cannot be moved and for which control rod drive mechanism damage has not been ruled out. The surveillance need not be completed within 24 hours if the number of inoperable rods has been reduced to less than 3 and if it has been demonstrated that control rod drive mechanism collet housing failure is not the cause of an immovable control rod.

b. The scram discharge volume drain and vent valves shall be verified open at least once per month. These valves may be closed intermittently for testing.

c. At least once every 3 months verify that the scram discharge volume drain and vent valves closed within 15 seconds after receipt of a closure signal, and reopen upon reset of the closure signal.

d. Deleted.

LIMITING CONDITIONS FOR OPERATION

3.3.A Reactivity Limitations (Cont'd)

f. Inoperable controls rods shall be positioned such that Specification 3.3.A.1 is met. In addition, during reactor power operation, no more than one control rod in any 5 x 5 array may be inoperable (at least 4 operable control rods must separate any 2 inoperable ones). If this Specification cannot be met the reactor shall not be started, or if at power, the reactor shall be brought to a cold shutdown condition within 24 hours.

B. Control Rods

1. Each control rod shall be coupled to its drive or completely inserted and the control rod directional control valves disarmed electrically. This requirement does not apply in the refuel condition when the reactor is vented. Two control rod drives may be removed as long as Specification 3.3.A.1 is met.

SURVEILLANCE REQUIREMENTS

4.3.A Reactivity Limitations (Cont'd)

B. Control Rods

1. The coupling integrity shall be verified for each withdrawn control rod as follows:

   a. When a rod is withdrawn the first time after each refueling outage or after maintenance, observe discernible response of the nuclear instrumentation and rod position indication for the "full-in" and "full-out" position. However, for initial rods when response is not discernible, subsequent exercising of these rods after the reactor is above the Rod Worth Minimizer low power setpoint shall be performed to verify instrumentation response.

   b. When the rod is fully withdrawn the first time after each refueling outage or after maintenance observe that the drive does not go to the overtravel position.

LIMITING CONDITIONS FOR OPERATION

3.3.B Control Rods (Cont'd)

2. The control rod drive housing support system shall be in place during reactor power operation or when the reactor coolant system is pressurized above atmospheric pressure with fuel in the reactor vessel, unless all control rods are fully inserted and Specification 3.3.A.1 is met.

3. a. Deleted.

   b. The Rod Worth Minimizer (RWM) low power setpoint is greater than or equal to 10% of rated power. Whenever the reactor is in the startup or run modes with thermal power less than or equal to the Rod Worth Minimizer (RWM) low power setpoint the Rod Worth Minimizer shall be operable except as follows:

   1. With the RWM inoperable after the first 12 control rods are fully withdrawn, operation may continue provided that control rod movement and compliance with the prescribed control rod pattern are verified by a second licensed operator or technically qualified member of the station technical staff.

SURVEILLANCE REQUIREMENTS

4.3.B Control Rods (Cont'd)

c. During each refueling outage and after control rod maintenance, observe that the drive does not go to the overtravel position.

2. The control rod drive housing support system shall be inspected after reassembly and the results of the Inspection recorded.

3. a. Deleted.

   b. 1. Prior to the start of control rod withdrawal towards criticality and prior to attaining the Rod Worth Minimizer low power setpoint during rod insertion at shutdown, the Rod Worth Minimizer (RWM) shall be demonstrated to be operable by the following checks:

      a. The RWM computer on line diagnostic test shall be successfully performed.

      b. Prior to the start of control rod withdrawal only, proper annunciation of the selection error of at least one out-of-sequence control rod in a fully inserted group shall be verified.

LIMITING CONDITIONS FOR OPERATION

3.3.B Control Rods (Cont'd)

2. With the RWM inoperable before the first 12 control rods are fully withdrawn, one startup per calendar year may be performed provided that control rod movement and compliance with the prescribed control rod pattern are verified by a second licensed operator or technically qualified member of the station technical staff.

3. Otherwise, with the RWM inoperable, control rod withdrawal movement shall not be permitted except by full scram. Control rods may be moved, under administrative control to permit testing associated with demonstrating operability of the RWM.

c. Deleted.

SURVEILLANCE REQUIREMENTS

4.3.B Control Rods (Cont'd)

c. The rod block function of the RWM shall be verified by withdrawing the first rod during start-up only as an out-of-sequence control rod no more than to the block point.

2. Following any loading of the rod worth minimizer sequence program into the computer, the correctness of the control rod withdrawal sequence input to the RWM computer shall be verified.

c. When required, the presence of the second licensed operator or technically qualified member of the station technical staff to verify the following of the correct rod program shall be verified and recorded.

3.3.A and 4.3.A BASES (Cont'd)

Studies have been made which compare experimental criticals with calculated criticals. These studies have shown that actual criticals can be predicted within a given tolerance band. For gadolinia cores the additional margin required due to control cell material manufacturing tolerances and calculational uncertainties has experimentally been determined to be 0.38% $\Delta k/k$. When this additional margin is demonstrated, it assures that the reactivity control requirement is met.

2. Reactivity Margin - Inoperable Control Rods

Specification 3.3.A.2 requires that a rod be taken out of service if it cannot be moved with drive pressure. If the rod is fully inserted and then disarmed electrically*, it is in a safe position of maximum contribution to shut down reactivity. If it is disarmed electrically in a non-fully inserted position, that position shall be consistent with the shutdown reactivity limitation stated in Specification 3.3.A.1. This assures that the core can be shutdown at all times with the remaining control rods assuming the strongest operable control rod does not insert. Inoperable bypassed rods will be limited within any group to not more than one control rod of a (5x5) twenty-five control rod array. Also if damage within the control rod drive mechanism and in particular, cracks in drive internal housings, cannot be ruled out, then a generic problem affecting a number of drives cannot be ruled out. Circumferential cracks resulting from stress assisted intergranular corrosion have occurred in the collet housing of drives at several BWRs. This type of cracking could occur in a number of drives and if the cracks propagated until severance of the collet housing occurred, scram could be prevented in the affected rods. Limiting the period of operation with a potentially severed rod and requiring increased surveillance after detecting one stuck rod will assure that the reactor will not be operated with a large number of rods with failed collet housings.

*To disarm the drive electrically, four Amphenol type plug connectors are removed from the drive insert and withdrawal solenoids rendering the rod incapable of withdrawal. This procedure is equivalent to valving out the drive and is preferred because, in this condition, drive water cools and minimizes crud accumulation in the drive. Electrical disarming does not eliminate position indication.

3.3 and 4.3 BASES (Cont'd)

B. Control Rods

1. Control rod dropout accidents as discussed in the FSAR can lead to significant core damage. If coupling integrity is maintained, the possibility of a rod dropout accident is eliminated. The overtravel position feature provides a positive check as only uncoupled drives may reach this position. Neutron instrumentation response to rod movement provides a verification that the rod is following its drive. Absence of such response to drive movement could indicate an uncoupled condition. Rod position indication is required for proper function of the rod worth minimizer (RWM).

2. The control rod housing support restricts the outward movement of a control rod to less than 3 inches in the extremely remote event of a housing failure. The amount of reactivity which could be added by this small amount of rod withdrawal, which is less than a normal single withdrawal increment, will not contribute to any damage to the primary coolant system. The design basis is given in subsection 3.5.2 of the FSAR and the safety evaluation is given in subsection 3.5.4. This support is not required if the reactor coolant system is at atmospheric pressure since there would then be no driving force to rapidly eject a drive housing. Additionally, the support is not required if all control rods are fully inserted and if an adequate shutdown margin with one control rod withdrawn has been demonstrated, since the reactor would remain subcritical even in the event of complete ejection of the strongest control rod.

3. The Rod Worth Minimizer (RWM) restricts withdrawals and insertions of control rods to prespecified sequences. All patterns associated with these restrictions have the characteristic that, assuming the worst single deviation from the restrictions, the drop of any control rod from the fully inserted position to the position of the control rod drive would not cause the reactor to sustain a power excursion resulting in the peak enthalpy of any pellet exceeding 280 calories per gram. An enthalpy of 280 calories per gram is well below the level at which rapid fuel dispersal could occur (i.e., 425 calories per gram). Primary system damage in this accident is not possible unless a significant amount of fuel is rapidly dispersed. Ref. Sections 3.6.6, 14.6.2 and 7.16.3.3 of the FSAR, NEDO-10527 and supplements thereto, and NEDE-24011-P-A.

3.3.B and 4.3.B BASES (Cont'd)

In performing the function described above, the RWM is not needed to impose any restrictions at core power levels in excess of 10 percent of rated power. Material in the cited references shows that it is impossible to reach 280 calories per gram in the event of a control rod drop occurring at a power level greater than 10 percent, regardless of the rod pattern. This is true for all normal and abnormal patterns, including those which maximize individual control rod worth.

The Rod Worth Minimizer provides automatic supervision to assure that out-of-sequence control rods will not be withdrawn or inserted; i.e., the RWM system limits operator deviations from planned control rod movement. The RWM is an important system for minimizing the consequences of an RDA below 10% power. The RWM is therefore required to be operable for all but one startup per year before the first twelve control rods are fully withdrawn. One startup per year before the first twelve control rods are fully withdrawn will be permitted with the RWM inoperable provided control rod movement and compliance with the prescribed control rod pattern are verified by a second licensed operator or technically qualified member of the station technical staff. The function of the RWM makes it unnecessary to specify a license limit on rod worth to preclude unacceptable consequences in the event of a control rod drop. At power levels below 10 percent of rated, the RWM forces adherence to acceptable rod patterns. Above 10 percent of rated power, no constraint on rod pattern is required to assure that rod drop accident consequences are acceptable. Control rod pattern constraints above 10 percent of rated power are imposed by power distribution requirements as defined in Section 3.5/4.5 of the Technical Specifications.

4. The Source Range Monitor (SRM) system performs no automatic safety system function; i.e., it has no scram function. It does provide the operator with a visual indication of neutron level. The consequences of reactivity accidents are functions of the initial neutron flux.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION SUPPORTING

AMENDMENT NOS. 151 AND 153 TO FACILITY OPERATING

LICENSE NOS. DPR-44 and DPR-56

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

PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3

DOCKET NOS. 50-277 AND 50-278

1.0 INTRODUCTION

By letter dated July 19, 1989, and supplemented on November 14, 1989, Philadelphia Electric Company (PECo, the licensee) requested amendments to Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station, Units 2 and 3, respectively. The amendments would change the Technical Specifications (TS) to permit removal of the rod sequence control system (RSCS) and reduce the rod worth minimizer (RWM) low power setpoint.

2.0 DISCUSSION

The rod sequence control system restricts rod movement to minimize the individual worth of control rods to lessen the consequences of a rod drop accident (RDA). Control rod movement is restricted through the use of rod select, insert, and withdraw blocks. The rod sequence control system is a hardwired, redundant backup to the rod worth minimizer. The RSCS is independent of the RWM in terms of inputs and outputs, but the two systems are compatible. The RSCS is designed to monitor and block, when necessary, operator-initiated selection, withdrawal and insertion action. The RSCS thereby assists in preventing significant control rod pattern errors that could lead to dropping a control rod having a high reactivity worth.

A significant rod pattern error is one of several abnormal events, all of which must occur coincidentally to have an RDA that might exceed fuel energy density limits. The RSCS was designed only for mitigation of an RDA and is active only during low power operation (currently less than 21 percent power), when an RDA could be significant. A similar pattern control function also is performed by the RWM, which is a computer controlled system. All BWRs that have an RSCS also have an RWM.

In response to a topical report submitted by the BWR Owner's Group on December 27, 1987 the NRC staff issued a letter and a supporting safety evaluation approving 1) elimination of the RSCS, while retaining the RWM to provide backup to the operator for control rod pattern control and 2) reducing the RWM low power setpoint to 10% of rated power from its current 25% setpoint. (Letter; A. C. Thadani, NRC to J. S. Charnley, GE, Subject: Acceptance for Referencing of Licensing Topical Report NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel," Revision 8, Amendment 17).

3.0 EVALUATION

The staff's letter of December 27, 1987 and supporting safety evaluation approving the topical report concluded that the modifications proposed by PECo were acceptable, provided:

1) The Technical Specifications include provisions for minimizing reactor operations with the RWM system inoperable.

2) The use of a second operator as a back-up to an inoperable RWM should be strengthened by a utility review of relevant procedures, related forms and quality assurance to ensure that the second operator provides an effective and truly independent monitoring process. A discussion of this review should accompany the request for RSCS removal.

3) Rod patterns used should be at least equivalent to banked position withdrawal sequence (BPWS) patterns.

With respect to item 1) above, the proposed TS submitted with this amendment application allows only one reactor startup per calendar year with the RWM unavailable prior to or during the withdrawal of the first 12 control rods. We conclude that item 1) is adequately satisfied.

With regard to item 2) above, PECo has described the programs and procedures that would be provided during instances when the RWM is not available to independently verify the correctness of an operator's actions during rod movements. Procedure AO 62A.1, Rod Worth Minimizer System Manual Bypass, has been revised to allow a technically qualified member of the station technical staff to back up the Reactor Operator when the RWM is inoperable. The procedure provides acceptable controls when used by the backup operator or technically qualified member of the station technical staff, as described in the licensee's November 14, 1989 submittal.

The RWM at Peach Bottom Units 2 and 3 uses the BPWS patterns recommended in the staff's December 27, 1987 letter. This satisfies item 3) above.

PECo's proposal to remove the RSCS and lower the RWM low power setpoint from 25 to 10 percent at Peach Bottom Units 2 and 3 meets the requirements detailed in the staff's letter of December 27, 1987.

Accordingly, the modifications proposed in PECo's letters of July 19, 1989 and November 14, 1989 are found to be acceptable and are hereby approved. We also have reviewed the proposed changes to the TS and find them to be consistent with the intent of the staff's safety evaluation approving the topical report and find the changes acceptable.

The revised Technical Specification pages approved and issued by the staff in these amendments differ from the proposed pages in the licensee's July 19, 1989 application to allow for appropriate pagination. Specifically, portions of TS 3.3.A.2.a and TS 4.3.A.2.a were moved from page 99 to page 100; and portions of TS 3.3.B.3.b and TS 4.3.B.3.b were moved from page 102a to page 102. The staff made no changes to the wording in the licensee's proposed TS pages.

4.0 ENVIRONMENTAL CONSIDERATIONS

These amendments involve both a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20, and changes to the surveillance requirements. The staff has determined that these amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission made a proposed determination that the amendments involve no significant hazards consideration, which was published in the Federal Register (54 FR 35108) on August 23, 1989, and consulted with the Commonwealth of Pennsylvania. No public comments were received and the Commonwealth of Pennsylvania had no comments. The licensee's November 14, 1989 letter discussed procedural controls governing the use of a technically qualified member of the station staff when bypassing the rod worth minimizer. The staff has determined that this additional information does not affect the proposed determination that the amendments involve no significant hazards consideration.

The staff 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: E. H. Trottier

Dated: December 4, 1989