

September 26, 1991

Docket Nos. 50-277
and 50-278

Mr. George J. Beck
Manager-Licensing, MC 5-2A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

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Dear Mr. Beck:

SUBJECT: ENVIRONMENTAL ASSESSMENT OF TECHNICAL EXEMPTION RELATING TO 10
CFR PART 50, APPENDIX R, REQUIREMENTS FOR THE PEACH BOTTOM ATOMIC
POWER STATION, UNITS 2 AND 3 (TAC NOS. 65147 AND 65148)

Enclosed is a copy of an "Environmental Assessment and Finding of No
Significant Impact" for your information. This assessment relates to your
review request dated December 10, 1986. In that letter, you requested that
the NRC staff review and concur with a Philadelphia Electric Company analysis
of three fire barrier configurations that did not meet 10 CFR Part 50,
Appendix R, Section III.G.2 fire rating requirements. In that letter, you also
requested that the NRC staff review and concur on a Philadelphia Electric
Company analysis of two penetration seal configurations that did not meet 10
CFR Part 50, Appendix R, Section III.M penetration seal qualification
requirements. In all five instances, you contended that the existing plant
configuration provided an equivalent level of protection as that required by 10
CFR Part 50, Appendix R.

The Environmental Assessment has been forwarded to the Office of the Federal
Register for publication.

Sincerely,

/s/

Joseph W. Shea, Acting Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Environmental Assessment

cc w/enclosure
See next page

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

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Sincerely,

A handwritten signature in black ink, appearing to read "Joseph W. Shea".

Joseph W. Shea, Acting Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Environmental Assessment

cc w/enclosure
See next page

Mr. George J. Beck
Philadelphia Electric Company

Peach Bottom Atomic Power Station,
Units 2 and 3

cc:

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Public Service Commission of Maryland
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UNITED STATES NUCLEAR REGULATORY COMMISSIONPHILADELPHIA ELECTRIC COMPANYPUBLIC SERVICE ELECTRIC AND GAS COMPANYDELMARVA POWER AND LIGHT COMPANYATLANTIC CITY ELECTRIC COMPANYDOCKET NOS. 50-277 AND 50-278ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption from certain requirements of 10 CFR Part 50, Appendix R, Section III.G and Section III.M for the Peach Bottom Atomic Power Station, Units 2 and 3, located at the licensee's site in York County, Pennsylvania.

ENVIRONMENTAL ASSESSMENTIdentification of Proposed Action:

The licensee would be exempted from the technical requirements of Section III.G.2, Appendix R to 10 CFR Part 50 as follows:

- 1) to the extent that the wall separating the individual Turbine Building Emergency Switchgear and Battery Rooms from each other and from an access corridor and two duct chases are constructed of concrete block with a fire resistance rating of only 2 hours;
- 2) to the extent that fire barriers between the access corridor on elevation 135 feet of the Turbine building and the 13KV switchgear area on elevation 116 feet of the Turbine building consists, in part, of two duct chases in two 4KV Emergency Switchgear Rooms, penetration fire stops and fire dampers within ducting inside the chase. The fire dampers and penetration stops are in different planes and different elevations. This configuration does not meet

the requirements of Section III.G.2 in that the intervening ducting between the fire dampers and penetration stops does not meet the required 3-hour fire rating; and

3) to the extent that a 1/8-inch steel angle atop a 3-hour rated fire barrier between the Radwaste Centrifuge and Sample Tank Area and the Remote Shutdown Panel area compromises the fire protection capability of the 3-hour rated fire barrier.

The licensee would be exempted from the technical requirements of Section III.M, Appendix R to 10 CFR Part 50 as follows:

1) to the extent that electrical conduit fire barrier penetration seals in approximately 1300 applications have not been tested in their ability to withstand a 3-hour fire; and

2) to the extent that seventeen normally energized 4KV bus ducts in the Turbine Building lack 3-hour rated penetration seals.

The exemption is in response to the licensee's request for NRC staff technical review and concurrence dated December 10, 1986.

The Need for the Proposed Action:

The exemption from Section III.G to allow present fire barrier configurations to not meet the specific 3-hour fire barrier rating is needed in order to preclude extensive plant modifications that do not significantly increase plant fire protection.

The exemption from Section III.M to allow present fire barrier cable conduits and 4KV bus ducting to not have 3-hour rated penetration seals is needed to avoid extensive penetration modifications that do not significantly increase plant fire protection.

Environmental Impact of the Proposed Actions:

The proposed exemption will provide a degree of fire protection that is equivalent to that required by Appendix R for the affected areas of the plants such that there is no increase in the risk of fires at these facilities. Consequently, the probability of fires has not been increased and the post-fire radiological releases will not be greater than previously determined, nor does the proposed exemption otherwise affect radiological plant effluents. Therefore, the Commission concludes that there is no significant radiological impacts associated with the proposed exemption.

With regard to potential non-radiological impacts, the proposed exemption involves features located entirely within the restricted area as defined in 10 CFR Part 20. It does not affect non-radiological plant effluents and has no other environmental impact. Therefore, the Commission concludes that there are no significant non-radiological environmental impacts associated with the proposed exemption.

Alternative to the Proposed Action:

Since the Commission has concluded that there are no measurable environmental impacts associated with the proposed exemption, any alternatives with equal or greater environmental impact need not be evaluated.

The principal alternative to the exemption would be to require rigid compliance with the applicable portions of Section III.G and Section III.M of the Appendix R requirements. Such action would not enhance the protection of the environment.

Alternative Use of Resources:

This action involves no use of resources not previously considered in the "Final Environmental Statement for the Peach Bottom Atomic Power Station, Units 2 and 3," dated April 1973.

Agencies and Persons Consulted:

The Commission's staff reviewed the licensee's request and did not consult other agencies or persons.

FINDING OF NO SIGNIFICANT IMPACT

The Commission has determined not to prepare an environmental impact statement for the proposed exemption.

Based upon the foregoing environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment.

For further details with respect to this action, see the licensee's request for NRC staff review dated December 10, 1986, which is 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, (Regional Depository) Education Building, Walnut Street and Commonwealth Avenue, Box 1601, Harrisburg, Pennsylvania 17105.

Dated at Rockville, Maryland, this 26th day of September 1991.

FOR THE NUCLEAR REGULATORY COMMISSION



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