July 6, 1992

Docket Nos. 50-277
and 50-278

Mr. George J. Beck
Manager-Licensing, MC 52A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Beck:

SUBJECT: EMERGENCY DIESEL GENERATOR SURVEILLANCE REQUIREMENTS, PEACH BOTTOM ATOMIC POWER STATION (PBAPS), UNIT NOS. 2 AND 3 (TAC NOS. M82778 AND M82779)

The Commission has issued the enclosed Amendments Nos. 168 and 172 to Facility Operating License Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3. These amendments consist of changes to the Technical Specifications in response to your application dated January 31, 1992, as supplemented by your letters dated April 28, 1992 and June 22, 1992.

These amendments modify the requirements of Technical Specification Section 4.5.F.1. The amended surveillance requirements specifies that in the event that a diesel generator becomes inoperable, for any reason other than preplanned preventative maintenance, the remaining operable diesel generators shall be demonstrated operable immediately and daily thereafter.

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

Enclosures:
1. Amendment No. 168 to DPR-44
2. Amendment No. 172 to DPR-56
3. Safety Evaluation

cc w/enclosures:
See next page

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

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See next page

cc:

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Review Division
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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. 168
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 January 31, 1992, as supplemented by letters dated April 28, 1992 and June 22, 1992, 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 or 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. 168 , 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

Charles L. Miller

Charles L. Miller, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 6, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 168

FACILITY OPERATING LICENSE NO. DPR-44

DOCKET NO. 50-277

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

Remove	Insert
132	132

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.5.F Minimum Low Pressure Cooling and Diesel Generator Availability	4.5.F Minimum Low Pressure Cooling and Diesel Generator Availability
1. During any period when one diesel generator is inoperable, continued reactor operation is permissible only during the succeeding seven days unless such diesel generator is sooner made operable provided that the remaining diesel generators and the low pressure core and containment cooling systems which are powered by the remaining diesel generators are operable. If this requirement cannot be met, an orderly shutdown shall be initiated and the reactor shall be placed in the Cold Shutdown Condition within 24 hours.	1. If a diesel generator becomes inoperable for any reason other than preplanned preventative maintenance or testing, the operable diesel generators shall be demonstrated to be operable immediately and daily thereafter.
2. Any combination of inoperable components in the core and containment cooling systems shall not defeat the capability of the remaining operable components to fulfill the cooling functions.	
3. When irradiated fuel is in the reactor vessel and the reactor is in the Cold Shutdown Condition, both core spray systems, the LPCI and containment cooling systems may be inoperable, provided no work is being done which has the potential for draining the reactor vessel.	
4. During a refueling outage, fuel and LPRM removal and replacement may be performed provided at least one of the following conditions below is satisfied:	

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. 172
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 January 31, 1992, as supplemented by letters dated April 28, 1992 and June 22, 1992, 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 or 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. 172, 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

Charles L. Miller

Charles L. Miller, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 6. 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 172

FACILITY OPERATING LICENSE NO. DPR-56

DOCKET NO. 50-278

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

Remove	Insert
132	132

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.5.F Minimum Low Pressure Cooling and Diesel Generator Availability	4.5.F Minimum Low Pressure Cooling and Diesel Generator Availability
1. During any period when one diesel generator is inoperable, continued reactor operation is permissible only during the succeeding seven days unless such diesel generator is sooner made operable provided that the remaining diesel generators and the low pressure core and containment cooling systems which are powered by the remaining diesel generators are operable. If this requirement cannot be met, an orderly shutdown shall be initiated and the reactor shall be placed in the Cold Shutdown Condition within 24 hours.	1. If a diesel generator becomes inoperable for any reason other than preplanned preventative maintenance or testing, the operable diesel generators shall be demonstrated to be operable immediately and daily thereafter.
2. Any combination of inoperable components in the core and containment cooling systems shall not defeat the capability of the remaining operable components to fulfill the cooling functions.	
3. When irradiated fuel is in the reactor vessel and the reactor is in the Cold Shutdown Condition, both core spray systems, the LPCI and containment cooling systems may be inoperable, provided no work is being done which has the potential for draining the reactor vessel.	
4. During a refueling outage, fuel and LPRM removal and replacement may be performed provided at least one of the following conditions below is satisfied:	

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 168 AND 172 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 January 31, 1992, as supplemented by letters dated April 28, 1992, and June 22, 1992, the Philadelphia Electric Company, Public Service Electric and Gas Company, Delmarva Power and Light Company and Atlantic City Electric Company (the licensees) submitted a request for changes to the Peach Bottom Atomic Power Station, Units 2 and 3, Technical Specifications (TS). The requested change would modify the surveillance requirements for the Emergency Diesel Generators (EDGs). The original application dated January 31, 1992 indicated that the licensee would be prepared to implement the enhanced testing requirements no earlier than July 31, 1992. Subsequent discussions with the NRC staff (the staff) determined that the licensee planned a series of EDG overhauls through the summer of 1992. By letter dated June 22, 1992, the licensee supplemented the original January 31, 1992 application by requesting that one provision of the original application be reviewed by the staff in advance of the remaining changes in order to better support the EDG overhauls. This safety evaluation addresses the one change requested in the supplemental letter dated June 22, 1992. A separate safety evaluation will be issued that addresses the changes requested in the January 31, 1992 letter.

The letter dated April 28, 1992 clarified several of the cross references that the licensee had used in the January 31, 1992 submittal to compare the current TS to the proposed TS. In addition, the April 28, 1992 supplement provided revised TS pages that corrected several typographical errors that had been included in the January 31, 1992 submittal. The letter dated April 28, 1992 did not change the substance of the original change request.

The supplement dated June 22, 1992 modified the implementation schedule of the January 31, 1992 submittal. In the January 31, 1992 letter, the licensee indicated that it would not be ready to implement the revised procedures to support the amendment prior to July 31, 1992. Subsequent discussions with the staff determined that the licensee would not be ready to implement the revised procedures until Janaury 1993. The staff expressed concern that the delayed implementation could subject the EDGs to unnecessary wear and tear and could result in unnecessarily aligning EDGs to the general power distribution grid during the course of a series of scheduled maintenance overhauls planned for the EDGs through the summer and fall of 1992.

The licensee then modified the January 31, 1992 request by requesting that some of the modifications to the Surveillance Requirements for an inoperable diesel generator be approved and implemented in advance of the remainder of the changes included in the January 31, 1992 submittal. The technical basis for the change included in this amendment is included in the January 31, 1992 and June 22, 1992 letters and is evaluated by the staff in this safety evaluation.

2.0 EVALUATION

In its letter dated January 31, 1992, the licensee proposed numerous changes to the TS requirements for EDGs. Several of these changes (including the changes labelled B.5 and B.6) address compensatory EDG requirements in the instance that a single EDG is inoperable. Change B.5 deletes the requirement to verify the operability of operable EDGs if an EDG is declared inoperable due to preplanned preventative maintenance or testing. Change B.6 reduces the frequency for repeating operability demonstrations from daily to once-per-72-hours following the determination that an EDG, an offsite circuit or one of each is inoperable. Both changes B.5 and B.6 represent modifications to current TS requirement 4.5.F.1.

In the supplemental letter dated June 22, 1992, the licensee requested to implement the changes that eliminate immediate and daily testing when an EDG is out of service for scheduled, preplanned, preventative maintenance prior to implementing the remainder of the changes. Specifically, the licensee proposed that Section 4.5.F.1 read:

> If a diesel generator becomes inoperable for any reason other than preplanned preventative maintenance or testing, the operable diesel generators shall be demonstrated to be operable immediately and daily thereafter.

The requirement to test operate operable EDGs when one EDG is inoperable is intended to provide increased assurance that the operable EDGs can satisfy the safety requirement for reliable standby AC power during a condition when one of the EDGs is known to be inoperable and to ensure that no EDG common mode

failure exists. However, in Generic Letter 84-15, "PROPOSED STAFF ACTIONS TO IMPROVE AND MAINTAIN DIESEL GENERATOR RELIABILITY," the staff concluded that excessive testing results in a degradation of the diesel engine. In the Generic Letter, the staff took the position that additional testing of EDGs during periods when emergency core cooling systems were inoperable could be eliminated. The inoperability of the ECCS component does not directly affect the availability and reliability of the EDG. The added assurance of EDG operability obtained by additional EDG testing is offset by the long term degradation in EDG reliability caused by wear due to additional EDG testing.

The licensee proposes to eliminate additional testing of EDGs during periods when one EDG is inoperable due to preplanned maintenance. A preplanned preventative maintenance outage is not expected to directly change the availability and reliability of the remaining EDGs and is not indicative of a potential failure in the remaining EDGs. The licensee proposes to perform accelerated operability tests of the operable EDGs during periods when a single EDG is inoperable for any reason other than preplanned preventative maintenance. This additional testing will provide additional assurance of the availability and reliability of the remaining EDGs when the cause and implications of the inoperability may not be fully known. The staff finds the licensee's proposal to eliminate additional EDG testing during periods when a single EDG is inoperable due to preplanned preventative maintenance and to perform accelerated testing during periods when a single EDG is inoperable for reasons other than preplanned preventative maintenance consistent with the guidance in Generic Letter 84-15 and, thus, acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the 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 (57 FR 20515). 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 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: J. Shea

Date: July 6, 1992