October 12, 1994

Mr. George A. Hunger, Jr.
Director-Licensing, MC 52A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, PA 19087-0195

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT RELATED TO REVISED MAXIMUM AUTHORIZED THERMAL POWER LIMIT, PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3 (TAC NOS. M86826 AND M86827)

Dear Mr. Hunger:

Enclosed is a copy of an Environmental Assessment and Finding of No Significant Impact for your information. This environmental assessment pertains to your application dated June 23, 1993, as supplemented by letters dated April 5, May 2, June 6, June 8, June 29, July 6 (two letters), July 7, July 20, July 28 (two letters), September 16, 1994 and September 30, 1994. The proposed amendment would raise the authorized maximum power level from 3293 MWt to a new limit of 3458 MWt.

The environmental assessment is being forwarded to the Office of the Federal Register for publication.

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

Docket Nos. 50-277
and 50-278

Enclosure:
Environmental Assessment

cc w/encl:
See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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UNITED STATES NUCLEAR REGULATORY COMMISSION

PHILADELPHIA ELECTRIC COMPANY

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DOCKET NOS. 50-277 AND 50-278

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

ENVIRONMENTAL ASSESSMENT AND FINDING OF

NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to Facility Operating License Nos. DPR-44 and DPR-56, issued to Philadelphia Electric Company (the licensee), for operation of the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, located in York County, Pennsylvania.

ENVIRONMENTAL ASSESSMENT

Identification of the Proposed Action:

This Environmental Assessment has been prepared to address the potential environmental issues related to the licensee's application to amend the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3 operating licenses. The proposed action would increase the licensed thermal power level of the reactors from the current limit of 3293 megawatts thermal (MWt) to a revised limit of 3458 MWt. This request is in accordance with the generic boiling water reactor (BWR) power uprate program established by the General Electric Company (GE) and approved by the U.S. Nuclear Regulatory Commission (NRC) staff in a letter from W. Russell, NRC, to P. Marriotte, General Electric,

dated September 30, 1991.

The proposed action involves NRC issuance of a license amendment to uprate the authorized power level by changing the Operating License, Appendices A ("Technical Specifications") and B ("Environmental Technical Specifications") to the Operating License. The proposed action is in accordance with the licensee's application for amendment dated June 23, 1993, as supplemented by letters dated April 5, May 2, June 6, June 8, June 29, July 6 (two letters), July 7, July 20, July 28 (two letters), September 16 and September 30, 1994.

The Need for the Proposed Action:

The proposed action is needed to permit an increase in the licensed core thermal power from 3293 MWt to 3458 MWt and provide the licensee with the flexibility to increase the potential electrical output of PBAPS, Units 2 and 3, providing additional electrical power to the licensees' domestic and commercial service areas.

Environmental Impacts of the Proposed Action:

The "Final Environmental Statement (FES) related to operation of Peach Bottom Atomic Power Station, Units 2 and 3" was issued in April 1973. The licensee submitted General Electric (GE) Topical Report, NEDC-32183P, "Power Rerate Safety Analysis Report for Peach Bottom 2 & 3," Class III, dated May 1993, as Attachment 3 to the June 23, 1993 submittal. NEDC-32183P contains the safety analysis prepared by GE to support this license change request and the implementation of power uprate at PBAPS Units 2 and 3. The analyses and evaluations supporting the proposed license changes were completed using the guidelines in GE Topical Report NEDC-31897P-A, "Generic

Guidelines for General Electric Boiling Water Reactor Power Uprate," Class III, dated May 1992, and NEDC-31984P, "Generic Evaluations of General Electric Boiling Water Reactor Power Uprate," Class III, dated July 1991. The staff reviewed and approved these Topical Reports in the September 30, 1991 letter described above and in a letter from W. Russell, NRC, to P. Marriotte, General Electric, dated July 31, 1992.

The licensee provided information regarding the non-radiological environmental effects of the proposed action in the June 23, 1993 application and supplemental information in the September 30, 1994 submittal. The licensee provided information regarding the radiological environmental effects of the proposed action in NEDC-32183P and supplemental information in the September 30, 1994 submittal. The staff has reviewed the potential radiological and non-radiological effects of the proposed action on the environment as described below.

Non-Radiological Environmental Assessment:

Power uprate will not change the method of generating electricity nor the method of handling any influents from nor effluents to the environment. Therefore, no new or different types of environmental impacts are expected.

The staff reviewed the non-radiological impact of operation at uprated power levels on influents from and effluents to the Conowingo Pond. Peach Bottom has a once-through circulating water system and five mechanical draft cooling towers for dissipating heat from the main turbine condensers. The cooling towers reject heat from the circulating water prior to discharge back to the Conowingo Pond. The cooling towers are operated in accordance with the requirements of the facility's National Pollution Discharge Elimination System

(NPDES) permit, Permit No. PA0009733. The NPDES permit includes a matrix which specifies the number of cooling towers that must be in operation as a function of total station thermal power production, circulating water pumps and average inlet water temperature.

By letters dated February 24 and March 31, 1994, the licensee provided information to the Pennsylvania Department of Environmental Resources (PA DER) regarding the impact of power uprate on cooling tower performance. In the February 24, 1994 letter, the licensee indicated that the uprated power levels would increase the temperature of the circulating water leaving the main condensers by approximately one degree fahrenheit. Operation at uprated power will cause additional heat to be rejected to the circulating water through the main condensers. The additional heat rejection would occur as a result of operation at slightly higher condenser pressures and discharge of circulating water from the main condenser with slightly higher temperatures as described above. The licensee provided a revised cooling tower matrix to the PA DER which addressed cooling tower operation at uprated power levels. The licensee noted that the lowest 7-day moving river temperature average for which cooling tower operation is required dropped from 53°F to 51°F. In general, the effect of operation at uprated power would be to increase the duty cycle of the cooling towers. By letter dated September 27, 1994, the PA DER recommended extension of the thermal variance (Section 316(a) of The Federal Water Pollution Control Act Amendments of 1972, P.L. 92-500, as amended) for the Peach Bottom Atomic Power Station. The state concluded that an increase in the plant's rated power level will not change the relative abundance, distribution and species composition of fish in the Conowingo Pond provided

the station is operated in accordance with the revised matrix. The PA DER indicated that the NPDES permit will be renewed in the near future to include the revised matrix.

The operating speed and characteristics of the circulating pumps will not be changed for power uprate. Thus, the volumetric flow rate and velocity of intake and outfall from the circulating water system would not be expected to change because of operation at uprated power levels. As stated above, the temperature of the water discharged from the condensers is expected to increase slightly; however, the licensee has determined that the increased heat load is within the capacity of the existing cooling towers. The operating matrix for the cooling towers was revised to maintain the temperature characteristics of the plant discharge plume equivalent to those of the existing plume. Because the flow rate, velocity and temperature of the plume are all not expected to change, no change to the overall thermal plume is expected.

The licensee does inject sodium hypochlorite into the circulating water system to retard growth of microorganisms with system components. The sodium hypochlorite injection rate is determined by the flow rate through the circulating water system, which will not change as a result of operation at uprated power levels. The licensee indicated the increased heat rejection rate from the cooling towers may lead to an increase in concentration of chemicals and contaminants in the cooling tower. However, the licensee is required by the NPDES permit to sample for residual chlorine in the outfall of the cooling towers on a daily basis and to maintain residual chlorine concentrations within the limits of the permit. The concentrations of

residual chlorine are not expected to exceed the existing permit limits. Based on the expected minimal effect of uprated power operation on cooling tower chemical concentrations and the monitoring requirements of the NPDES permit, the staff concludes the impact of any potential increase in cooling tower chemical effluent concentration on the environment is not significant.

Effluent discharges from other systems were also considered. Effluent limits for systems such as roof drains and yard drains, the auxiliary boiler and the sewage treatment plant are established in the NPDES permit. Discharges from these systems are not changed by operation at uprated power. Thus, the impact on the environment from these systems as a result of operation at uprated power levels is not significant.

Because the flow rate and velocity of influent to and effluent from the circulating water and service water systems will remain unchanged by operation at uprated power levels, no increased entrainment of planktonic organisms and or impingement of fish is expected. As part of the request to update the NPDES permit, the licensee submitted a report of aquatic sampling that was performed in the Conowingo Pond in October and November 1993. The report was provided to the NRC in the June 29, 1994 letter. The objective of the study was to "determine the relative abundance and distribution of fishes in Conowingo Pond, particularly the thermal effluent, and compare the results with the historic record." The report concluded that "No obvious changes in the species abundance, except for the gizzard shad in recent years, were observed between 1993 and the historic record. Changes in the abundance of a particular species has historically been associated with year class strength. Strong year classes are associated with increased abundance of a species."

Samples of the gizzard shad were generally stronger than the historic record for the various sample locations and methods.

Operation at uprated power levels will not result in increased noise generation for the majority of plant equipment. Some of this equipment, such as the main turbine and generator will operate at the same speed and thus will not contribute to increased offsite noise. Other equipment, such as reactor feed pumps, will operate at increased speeds; however, the majority of this type of equipment is located within plant structures and will not lead to increased offsite noise levels. The impact of a potential increase in noise from the cooling towers was considered. As described previously, operation of the cooling towers is controlled by the requirements of the NPDES permit. Operation of the facility at uprated power levels is not expected to result in operation of more cooling towers than are operated under current power limits. Thus the existing cooling tower noise levels would not be expected to change. However, the existing cooling towers may be operated for an increased number of days per year. The licensee qualitatively estimated that the cooling tower duty cycle would increase by a small amount (in terms of cooling tower-days per year). Thus, the current cooling tower noise levels would exist for a slightly increased number of days per year and the environmental effect of increased noise would be insignificant.

The FES described the impact of plant operation on fogging in the vicinity of the facility. Fogging estimates were made for a number of locations near the plant. The FES discussed that the increase in fogging due to plant operation over the natural occurrence of fogging was expected to be

minimal and not significant. The staff expects that operation of the plant at uprated power levels will result in only a minimal increase in fogging over that discussed in the FES. Thus, the impact of plant operation on local fogging, including operation at uprated power, remains insignificant.

Makeup water requirements are not expected to change significantly, if at all, due to operation at uprated power levels. The circulating water system, service water systems and cooling towers are once-through systems and, as such, do not have makeup requirements. The licensee indicated that operation of the reactor at slightly (< 30 psig) higher operating pressures may lead to slightly higher valve packing leak rates. System leakage, however, is processed through the liquid radwaste system and returned to the condensate storage tank for reuse. Based on the above considerations, the staff concluded that the effect of makeup requirements at uprated power levels on the environment is not significant.

Radiological Environmental Assessment:

The licensee evaluated the impact of the proposed amendment to show that the applicable regulatory acceptance criteria continue to be satisfied for the uprated power conditions. In conducting this evaluation, the licensee considered the effect of the higher power level on source terms, on-site and offsite doses, and control room habitability during both normal operation and accident conditions. The licensee provided information regarding the radiological environmental effects of the proposed action in NEDC-32183P and supplemental information in the September 30, 1994 submittal. In Sections 8.1 and 8.2 of NEDC-32183P, the licensee discussed the potential effect of power uprate on liquid and gaseous radioactive waste systems. Sections 8.3 and 8.4

discussed the potential effect of power uprate on radiation sources in the reactor core during operation and post-operation, and radiation sources in the coolant resulted from coolant activation products, activated corrosion products and fission products. Section 8.5 of the Topical Report discussed the radiation levels during normal operation, normal post-operation, post-accident, and offsite doses during normal operation. Finally, Section 9.2 of NEDC-32183P presented the results of calculated whole body and thyroid doses at the uprated power and current authorized power conditions at the exclusion area boundary and the low population zone that might result from the postulated design basis radiological accidents [i.e., loss-of-coolant-accident (LOCA), main steam line break accident (MSLBA) outside containment, fuel handling accident (FHA) and control rod drop accident (CRDA)].

In Section 8.1 of NEDC-32183P, the licensee stated that there will be only a slight increase in the liquid radwaste collection as a result of operation at higher power levels. The largest contributor to the liquid waste results from the backwash of the condensate demineralizers. The power uprate will increase the flow rate through the condensate demineralizers, with a subsequent reduction in the average time between backwashing. Additionally, neither the floor drain collector subsystem nor the waste collector subsystem is expected to experience a significant increase in the total volume of liquid waste due to operation at the uprated condition.

The licensee stated that while the activated corrosion products in liquid wastes are expected to increase proportionally to the power uprate, the total volume of processed waste is not expected to increase appreciably since the only significant increase in processed waste is due to the more frequent

backwashes of condensate and reactor water cleanup (RWCU) system demineralizers. The licensee noted that backwashing is normally initiated as a result of high differential pressure rather than activity content and that this is expected to remain the case for operation under uprated power conditions. Based on its analyses of the liquid radwaste system, the licensee has concluded the requirements of 10 CFR Part 20 and 10 CFR Part 50, Appendix I, will be met. Based on the above considerations, the staff concluded that the effect on the environment of operation of the liquid radiological waste stream at uprated power levels is not significant.

The gaseous waste management systems collect, control, process, store and dispose of gaseous radioactive waste generated during normal operation and abnormal operational occurrences. The gaseous waste management systems include the offgas system, standby gas treatment system (SGTS), and various building ventilation systems. The systems are designed to meet the requirements of 10 CFR Part 20 and 10 CFR Part 50, Appendix I.

In its power uprate submittal, the licensee has stated that the greatest contributor of radioactive gases are the non-condensible radioactive gases from the main condenser, including activation gases (principally N-16, O-19, and N-13) and radioactive noble gas parents. The increase in production of these gases is expected to be approximately proportional to the core power increase. These non-condensible radioactive gases, along with nonradioactive air due to in-leakage to the condenser, are continuously removed by the steam jet air ejector from the main condensers, and discharge into the offgas system. The flow of these gases into the offgas system are included with the

flow of H_2 and O_2 from the recombiner, which will also increase linearly with core power. Radioactive gases and H_2 and O_2 pass from the recombiner through an adsorber bed, holdup pipe, HEPA filters and exit the facility through the main stack. Gaseous activity effluent release rates are monitored down stream of the adsorber bed and alarms are provided in the control room. The licensee has stated that the operational increases in gases are not significant when compared to the current total system flow.

The design basis for the offgas system is for activity release rates of 100,000 microcuries per second based on a mixture of activation and fission product gases and fuel leakage and a 30-minute holdup time. The system is designed to meet the requirements of 10 CFR Part 20 and 10 CFR Part 50, Appendix I. Performance of the system at uprated power levels is expected to remain within the system design basis and, thus, to continue to meet the requirements of 10 CFR Part 20 and 10 CFR Part 50, Appendix I.

The contribution of gases to the gaseous waste management system from building ventilation systems is not expected to increase significantly with power uprate because 1) the amount of fission products released into the reactor coolant depends on the number and nature of the fuel rod defects and is not dependent on reactor power, and 2) the concentration of coolant activation products is expected to remain unchanged since the linear increase in the production of these products will be offset by the linear increase in steaming rate.

Based on its review of the gaseous waste management system, the staff concluded that the effect on the environment of operating the gaseous radiological waste stream at uprated power is not significant.

The licensee has evaluated the effects of the power rerate on in-plant radiation levels in the Peach Bottom 2 and 3 facility during normal conditions. The radiation levels during periods of normal operation and post-operation are expected to increase by no more than the percentage increase in power level. However, because many areas of the plant were designed for higher than expected radiation sources, the small increase in radiation levels expected due to power rerate will not affect radiation zoning or shielding in the plant.

During periods of normal and post-operation conditions, individual worker exposures will be maintained within acceptable limits by the existing "as-low-as-reasonably-achievable" (ALARA) program, which controls access to radiation areas. The ALARA program at Peach Bottom has been instrumental in the lowering of annual collective doses at the plant over the past several years. Since 1985, the three-year average dose at Peach Bottom 2 and 3 has decreased by approximately 70 percent.

The licensee stated that the original accident radiological consequence analyses could not be exactly reconstituted and, therefore, the reconstituted analyses were performed using methodology described in the updated final safety analysis report (UFSAR) with the original licensing basis assumptions at 3528 MWt (102 percent of the uprated power level). The licensee's reconstituted analyses indicate the calculated offsite radiological consequence doses are within the dose reference values given in 10 CFR Part 100 and also meet the control room operator dose limit given in 10 CFR 50, Appendix A, General Design Criteria (GDC) 19.

In the Peach Bottom operating license safety evaluation report issued in August 1972 (Safety Evaluation of the Peach Bottom Atomic Power Station Units 2 & 3, Docket Nos: 50-277, 50-278" issued by the Atomic Energy Commission, dated August 11, 1972), the staff performed an independent radiological consequence analyses at 3440 MWt (105 percent of current power level). The staff believes that, in general, offsite and control room operator doses will increase proportionally to the increase in power level. Therefore, the staff did not recalculate the offsite and control room operator doses resulting from a postulated design basis loss of coolant accident (which is the controlling design basis accident (DBA)). Instead, the staff proportionally increased the doses based on power levels using the same licensing basis assumptions used in 1972 and compared them with the licensee's reconstituted calculation (See Table 1 below). Neither the staff nor the licensee included radiation doses resulting from (1) main steam line isolation valve leakages and (2) SGTS fission-product bypass during the reactor building pressure drawdown time following a DBA, since they were not included in the original licensing basis assumptions.

TABLE 1

		EAB		LPZ		
		Thyroid	Whole Body	Thyroid	Whole Body	
		(rem)		(rem)		
SER	3440 MWt	14.0	1	105	3	(note 1)
	3528 MWt	14.4	1	108	3	(note 2)
UFSAR	3440 MWt	12.5	0.4	201	1.3	
	3528 MWt	14.8	0.6	239	3.9	
Part 100 Limits		300	25	300	25	

Note 1 Safety Evaluation for Peach Bottom Atomic Power Station Units 2 and 3 (August 1972)

Note 2 Uprated based on power ratio

Based on a review of the licensee's major assumptions and methodology used in their reconstituted dose calculations and the staff's original safety

evaluation, the staff finds that the offsite radiological consequences and control room operator doses at uprated 3528 MWt still remain below 10 CFR Part 100 dose reference values and GDC 19 dose limit and the increase in radiological consequences is very minor.

It is expected that the increased energy requirements associated with operation at uprated power will require an increase in the reload fuel enrichment and will result in increased burnup. The NRC previously evaluated the environmental impacts associated with burnup values of up to 60,000 MWd/MT with fuel enrichments up to 5% ^{235}U (published in the Federal Register, 53 FR 6040 dated February 29, 1988). The staff concluded that the environmental impacts associated with Table S-3 of 10 CFR 51.51, "Uranium Fuel Cycle Environmental Data," and Table S-4 of 10 CFR 51.52, "Environmental Effects of Transportation of Fuel and Waste," are conservative and bound the corresponding impacts for burnup levels of up to 60,000 MWd/MtU and ^{235}U enrichments up to 5 percent by weight. In the September 30, 1994 submittal, the licensee indicated that while fuel burnup and enrichment levels may increase as a result of operation at uprated power, the burnup and enrichment will remain within the 5% enrichment and 60,000 MWd/MT value previously evaluated by the staff. Based on the above cited environmental assessment and the licensee's statements regarding expected burnup and enrichment values, the staff concludes that the environmental effects of increased fuel cycle and transportation activity as a result of operation at uprated power levels are not significant.

The NRC staff has reviewed the licensee's re-evaluation of the potential radiological and non-radiological environmental impacts for the proposed

action. On the basis of the review described above, the NRC staff finds that the radiological and non-radiological environmental impacts associated with the proposed small increase in power are very small and do not change the conclusion in the FES that the operation of Peach Bottom Atomic Power Station, Units 2 and 3, would cause no significant adverse impact upon the quality of the human environment.

Accordingly, the Commission concludes that this proposed action would result in no significant radiological or non-radiological environmental impact.

Alternatives to the Proposed Action:

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

The principal alternative to the action would be to deny the request. Such action would not significantly reduce the environmental impact of plant operation but would restrict operation of Peach Bottom Atomic Power Station, Units 2 and 3 to the currently licensed power level and prevent the facility from generating the additional 60 MWe that is obtainable from the existing plant design.

Alternative Use of Resources:

This action does not involve the use of any resources not previously considered in the "Final Environmental Statement related to the operation of Peach Bottom Atomic Power Station, Units 2 and 3," dated April 1973.

Agencies and Persons Consulted:

The NRC staff has reviewed the licensee's request and consulted with the

Bureau of Radiation Protection, Pennsylvania Department of Environmental Resources, regarding the environmental impact of the proposed action. The State official had no comments regarding NRC's proposed action.

FINDING OF NO SIGNIFICANT IMPACT

Based upon the environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed action.

For further details with respect to the proposed action, see the licensee's letter dated June 23, 1993, as supplemented by letters dated April 5, May 2, June 6, June 8, June 29, July 6 (two letters), July 7, July 20, July 28 (two letters), September 16, 1994 and September 30, 1994, which are available for public inspection at the Commission's Public Document Room, The Gelman Building, 2120 L Street, NW., Washington, DC 20555, and at the local public document room located at the State Library of Pennsylvania, Government Publications Section, (REGIONAL DEPOSITORY) Education Building, Walnut Street and Commonwealth Avenue, Box 1601, Harrisburg, Pennsylvania 17105.

Dated at Rockville, Maryland, this 12th day of October 1994.

FOR THE NUCLEAR REGULATORY COMMISSION

John F. Stolz

John Stolz, Director
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