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NOV 2 2 1974

Dockets Nos. 50-277
and 50-278

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

Gentlemen:

The Commission has issued the enclosed Amendments Nos. 5 and 3 to Facility Operating Licenses Nos. DPR-44 and DPR-56 respectively, for the Peach Bottom Atomic Power Station, Units No. 2 and 3. These amendments include Changes Nos. 6 and 3 respectively and are in response to your request of July 12, 1974.

These amendments revise the provisions in the Technical Specifications relating to fuel densification. Operation of the facilities will be within the limits and restrictions of both the change to the Technical Specifications and the Emergency Core Cooling System evaluation.

A copy of the Federal Register Notice is also enclosed.

Sincerely,

Original Signed

George Lear, Chief
Operating Reactors Branch #3
Directorate of Licensing

Enclosures:
1. Amendments Nos. 6 and 3
2. Federal Register Notice

cc: See next page

OFFICE ➤	ORB#3	ORB#3	ORB#3	L:AD/ORs		
SURNAME ➤	DMElliott:kmf	SATeets	GLear	KRGoller		
DATE ➤	11/ /74	11/ /74	11/ /74	11/ /74		

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☆ U. S. GOVERNMENT PRINTING OFFICE: 1974-526-166

cc: w/enclosures

Eugene J. Bradley, Esquire
Philadelphia Electric Company
Assistant General Counsel
2301 Market Street
Philadelphia, Pennsylvania 19101

Albert R. Steele, Chairman
Board of Supervisors
Peach Bottom Township
R. D. No. 1
Delta, Pennsylvania 17314

Wilmer P. Bolton
Chairman, Board of Supervisors
Drumore Township
R. D. No. 1
Holtwood, Pennsylvania 17532

Mrs. Louisa R. Yeagley
Martin Memorial Library
159 E. Market Street
York, Pennsylvania 17401

Mr. R. A. Heiss, Coordinator
Pennsylvania State Clearinghouse
Governor's Office of State Planning
and Development
P. O. Box 1323
Harrisburg, Pennsylvania 17120
(w/o enclosures)

Mr. Thomas M. Gerusky, Director
Office of Radiological Health
Department of Environmental
Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17105

Troy B. Conner, Jr., Esquire
Conner, Hadlock & Knotts
1747 Pennsylvania Avenue, NW
Washington, D. C. 20006

Raymond L. Hovis, Esquire
35 South Duke Street
York, Pennsylvania 17401

W. W. Anderson, Esquire
Deputy Attorney General
Department of Justice
Second Floor - Capitol Annex
Harrisburg, Pennsylvania 17120

John B. Griffith, Esquire
Special Assistant Attorney
General, Maryland
Annapolis, Maryland

Warren Rich, Esquire
Special Assistant Attorney
General, Maryland
Annapolis, Maryland 21401

Mr. Robert Blanco
Environmental Protection Agency
Region III
Curtis Building
6th and Walnut Street
Philadelphia, Pennsylvania 19106

UNITED STATES
ATOMIC ENERGY COMMISSION
WASHINGTON, D.C. 20545

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-277

PEACH BOTTOM ATOMIC POWER STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 5
License No. DPR-44

1. The Atomic Energy Commission (the Commission) has found that:

   A. The application for amendment by Philadelphia Electric Company (the licensee) dated July 12, 1974, 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. No request for a hearing or petition for leave to intervene was filed following notice of the proposed action.

2. Accordingly, the license is amended by a change to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility 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, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications, as revised by issued changes thereto through Change No. 6."

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

FOR THE ATOMIC ENERGY COMMISSION

for Karl R. Goller, Assistant Director
for Operating Reactors
Directorate of Licensing

Attachment:
Change No. 6 to the
Technical Specifications

Date of Issuance: NOV 2 2 1974

ATTACHMENT TO LICENSE AMENDMENT NO.

(CHANGE NO. 6 TO THE TECHNICAL SPECIFICATIONS)

FACILITY OPERATING LICENSE NO. DPR-44

DOCKET NO. 50-277

Replace pages 133a, 134, 140, 140a and 142 with the attached revised pages. Add the attached new page 133b. (No changes were made on page 134.)

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
3.5.I Average Planar LHGR During steady state power operation, the average linear heat generation rate (LHGR) of all the rods in any fuel assembly, as a function of average planar exposure, at any axial location, shall not exceed the maximum average planar LHGR shown in Figure 3.5.1.A or Figure 3.5.1.B.* 6	4.5.I Average Planar LHGR Daily during reactor power operation the average planar LHGR shall be checked.
3.5.J Local LHGR During steady state power operation, the linear heat generation rate (LHGR) of any rod in any fuel assembly at any axial location shall not exceed the maximum allowable LHGR as calculated by the following equation: $LHGR_{max} \leq LHGR_d \left[1 \left(\frac{\Delta P}{P}\right)_{max} \left(\frac{L}{L_T}\right)\right]$ $LHGR_d$ = Design LHGR = 18.5 kw/ft. $\frac{\Delta P}{P_{max}}$ = Maximum power spiking penalty = 0.037 unit 2 = 0.032 unit 3 L_T = Total core length = 12 ft. = 12 feet Unit 2 = 12.167 feet Unit 3 L = Axial position above bottom of core	4.5.J Local LHGR Daily during reactor power operation the local LHGR shall be checked.

*On August 5, 1974, Philadelphia Electric Company submitted an Emergency Core Cooling System (ECCS) evaluation and proposed changes to the Technical Specifications in accordance with 10 CFR Part 50, Section 50.46. Upon submittal of the ECCS evaluation and proposed Technical Specifications, 10 CFR Part 50, Section 50.46(a)(2)(iv) required that the facility shall be operated within the (more conservative) limits of both the proposed and approved Technical Specifications. In order to satisfy 10 CFR Part 50, Section 50.46, facility operation shall therefore be within all the limits and restrictions

6

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT

*of both this Technical Specification change and the ECCS evaluation, including the proposed Technical Specifications, submitted on August 5, 1974, unless modified by the Director of Regulation pursuant to 10 CFR Part 50, Section 50.46 (a)(2)(v).

6

3.5.A BASES

Core Spray and LPCI Subsystems

This specification assures that adequate emergency cooling capability is available whenever irradiated fuel is in the reactor vessel.

Based on the loss-of-coolant analysis included in General Electric Topical Report NEDO-10329 and the sensitivity studies given in Supplement 1 thereto and subsection 6.7 of the FSAR and the Philadelphia Electric Company letter dated August 26, 1971, and in accordance with the AEC's "Interim Acceptance Criteria for Emergency Core Cooling Systems" published on June 19, 1971, any of the following cooling systems provides sufficient cooling to the core to dissipate the energy associated with the loss-of-coolant accident, to limit calculated fuel clad temperature to less than 2300°F to assure that core geometry remains intact, and to limit clad metal-water reaction to less than 1%; the two core spray subsystems; or either of the two core spray subsystems and two RHR pumps operating in the LPCI mode with operable LPCI injection valves.

The limiting conditions of operation in Specifications 3.5.A.1 through 3.5.A.6 specify the combinations of operable subsystems to assure the availability of the minimum cooling systems noted above.

Core spray distribution has been shown, in full-scale tests of systems similar in design to that of Peach Bottom 2 and 3, to exceed the minimum requirements by at least 25%. In addition, cooling effectiveness has been demonstrated at less than half the rated flow in simulated fuel assemblies with heater rods to duplicate the decay heat characteristics of irradiated fuel. The accident analysis is additionally conservative in that no credit is taken for spray coolant entering the reactor before the internal pressure has fallen to 105 psig.

The LPCI subsystem is designed to provide emergency cooling to the core by flooding in the event of a loss-of-coolant accident. This system functions in combination with the core spray system to prevent excessive fuel clad temperature. The LPCI subsystem and the core spray subsystem provide adequate cooling for break areas of approximately 0.2 square feet up to and including the double-ended recirculation line break without assistance from the high pressure emergency core cooling subsystems.

3.5 BASES (cont'd.)

H. Engineered Safeguards Compartments Cooling and Ventilation

One unit cooler in each pump compartment is capable of providing adequate ventilation flow and cooling. Engineering analyses indicate that the temperature rise in safeguards compartments without adequate ventilation flow or cooling is such that continued operation of the safeguards equipment or associated auxiliary equipment cannot be assured. Ventilation associated with the High Pressure Service Water Pumps is also associated with the Emergency Service Water pumps, and is specified in Specification 3.9.

I. Average Planar LHGR

This specification assures that the peak cladding temperature following the postulated design basis loss-of-coolant accident will not exceed the 2300°F limit specified in the Interim Acceptance Criteria (IAC) issued in June 1971 considering the postulated effects of fuel pellet densification.

The peak cladding temperature following a postulated loss-of-coolant accident is primarily a function of the average heat generation rate of all the rods of a fuel assembly at any axial location and is only dependent secondarily on the rod to rod power distribution within an assembly. Since expected local variations in power distribution within a fuel assembly affect the calculated peak clad temperature by less than ± 20 F relative to the peak temperature for a typical fuel design, the limit on the average linear heat generation rate is sufficient to assure that calculated temperatures are below the IAC limit.

The maximum average planar linear heat generation rates shown in Figures 3.5.1.A and 3.5.1.B are based on calculations employing the GEGAP III model described in the General Electric reports NEDO-20181, "GEGAP III, A Model for the Prediction of Pellet-Clad Thermal Conductance in BWR Fuel Rods," November 1973 with related proprietary information provided in NEDC-20181 (Proprietary), November 1973. 6

GEGAP III is a theoretical model which provides an exposure dependent pellet-clad gap thermal conductance by incorporating time-dependent fuel densification, time-dependent gap closure, and gap closure effects due to cladding creepdown. Validity of GEGAP III has been verified by comparison with in-reactor experimental results. The accuracy of the evaluation of fuel performance, post LOCA, was improved with the use of GEGAP III, since previous gap conductance models did not have the capability for calculating the fuel cladding gap conductance as a function of fuel lifetime. 6

Use of the GEGAP III model yields an increase in the calculated pellet-clad gap conductance which in turn causes a decrease in the calculated stored energy in the fuel rods. A reduction in calculated stored energy reduces the calculated peak clad temperature following a postulated LOCA or, conversely, allows a compensating increase in MAPLHGR for a constant calculated peak clad temperature. The specified MAPLHGR values maintain a calculated peak clad temperature within the limitation imposed by the IAC. 6

J. Local LHGR

This specification assures that the linear heat generation rate in any rod is less than the design linear heat generation even if fuel pellet densification is postulated. The power spike penalty specified is based on the analysis presented in Section 3.2.1 of the GE topical report NEDM-10735 Supplement 6, and assumes a linearly increasing variation in axial gaps between core bottom and top, and assures with a 95% confidence, that no more than one fuel rod exceeds the design linear heat generation rate due to power spiking.

Figure 3.5.1.A

PBAPS INITIAL CORE TYPE 2

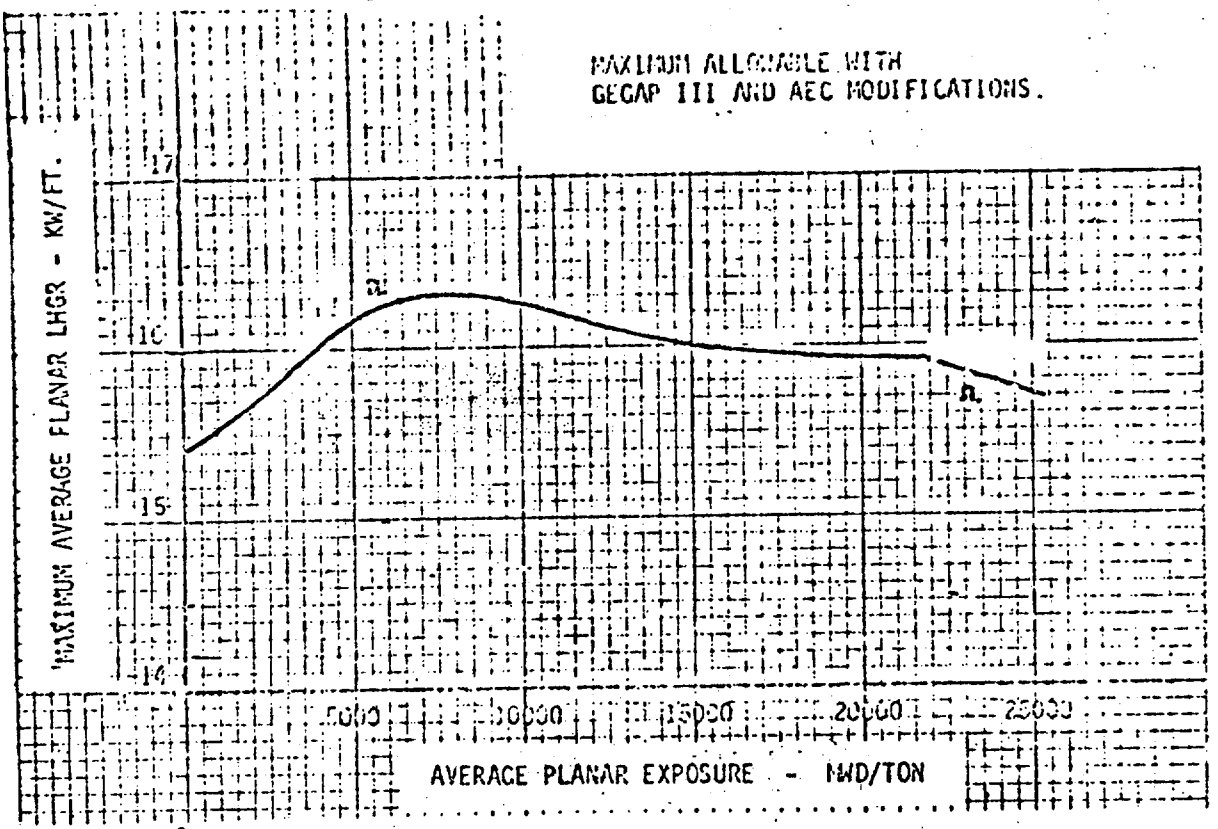

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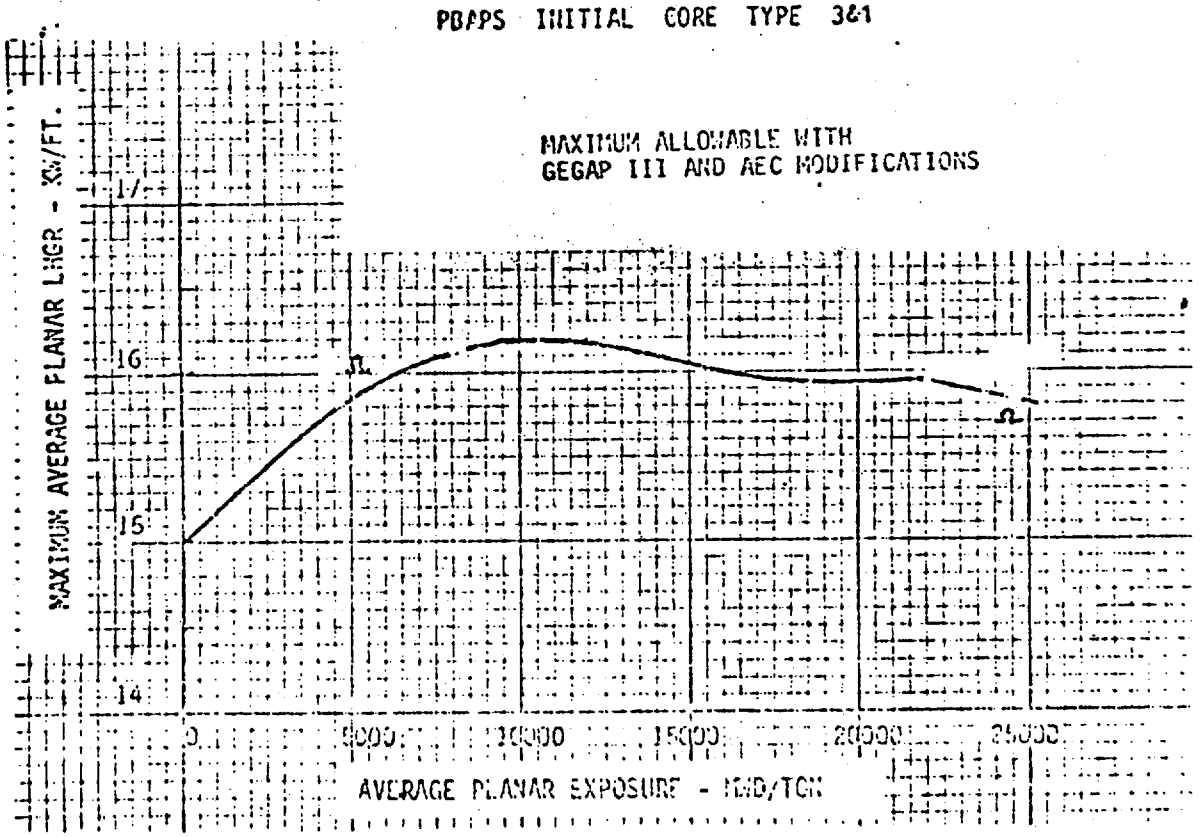
FIGURE 3.5.1.B

PBAPS INITIAL CORE TYPE 3&4



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UNITED STATES
ATOMIC ENERGY COMMISSION
WASHINGTON, D.C. 20545

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-278

PEACH BOTTOM ATOMIC POWER STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 3
License No. DPR-56

1. The Atomic Energy Commission (the Commission) has found that:

   A. The application for amendment by Philadelphia Electric Company (the licensee) dated July 12, 1974, 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. No request for a hearing or petition for leave to intervene was filed following notice of the proposed action.

2. Accordingly, the license is amended by a change to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility 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, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications, as revised by issued changes thereto through Change No. 3."

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

FOR THE ATOMIC ENERGY COMMISSION

for Robert Reid

Karl R. Goller, Assistant Director
for Operating Reactors
Directorate of Licensing

Attachment:
Change No. 3 to the
Technical Specifications

Date of Issuance: NOV 2 2 1974

ATTACHMENT TO LICENSE AMENDMENT NO. 3

(CHANGE NO. 3 TO THE TECHNICAL SPECIFICATIONS

FACILITY OPERATING LICENSE NO. DPR-56

DOCKET NO. 50-278

Replace pages 133a. 134, 140, 140a and 142 with the attached revised pages. Add the attached new page 133b. (No changes were made on page 134.)

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
3.5.I Average Planar LHGR During steady state power operation, the average linear heat generation rate (LHGR) of all the rods in any fuel assembly, as a function of average planar exposure, at any axial location, shall not exceed the maximum average planar LHGR shown in Figure 3.5.1.A or Figure 3.5.1.B.*	4.5.I Average Planar LHGR Daily during reactor power operation the average planar LHGR shall be checked.
3.5.J Local LHGR During steady state power operation, the linear heat generation rate (LHGR) of any rod in any fuel assembly at any axial location shall not exceed the maximum allowable LHGR as calculated by the following equation: $LHGR_{max} \leq LHGR_d \left[1 \left(\frac{\Delta P}{P}\right)_{max} \left(\frac{L}{L_T}\right)\right]$ $LHGR_d$ = Design LHGR = 18.5 kw/ft. $\frac{\Delta P}{P_{max}}$ = Maximum power spiking penalty = 0.037 unit 2 = 0.032 unit 3 L_T = Total core length = 12 ft. = 12 feet Unit 2 = 12.167 feet Unit 3 L = Axial position above bottom of core	4.5.J Local LHGR Daily during reactor power operation the local LHGR shall be checked.

*On August 5, 1974, Philadelphia Electric Company submitted an Emergency Core Cooling System (ECCS) evaluation and proposed changes to the Technical Specifications in accordance with 10 CFR Part 50, Section 50.46. Upon submittal of the ECCS evaluation and proposed Technical Specifications, 10 CFR Part 50, Section 50.46(a)(2)(iv) required that the facility shall be operated within the (more conservative) limits of both the proposed and approved Technical Specifications. In order to satisfy 10 CFR Part 50, Section 50.46, facility operation shall therefore be within all the limits and restrictions

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT

3 *of both this Technical Specification change and the ECCS evaluation, including the proposed Technical Specifications, submitted on August 5, 1974, unless modified by the Director of Regulation pursuant to 10 CFR Part 50, Section 50.46 (a)(2)(v).

3.5.A BASES

Core Spray and LPCI Subsystems

This specification assures that adequate emergency cooling capability is available whenever irradiated fuel is in the reactor vessel.

Based on the loss-of-coolant analysis included in General Electric Topical Report NEDO-10329 and the sensitivity studies given in Supplement 1 thereto and subsection 6.7 of the FSAR and the Philadelphia Electric Company letter dated August 26, 1971, and in accordance with the AEC's "Interim Acceptance Criteria for Emergency Core Cooling Systems" published on June 19, 1971, any of the following cooling systems provides sufficient cooling to the core to dissipate the energy associated with the loss-of-coolant accident, to limit calculated fuel clad temperature to less than 2300°F to assure that core geometry remains intact, and to limit clad metal-water reaction to less than 1%; the two core spray subsystems; or either of the two core spray subsystems and two RHR pumps operating in the LPCI mode with operable LPCI injection valves.

The limiting conditions of operation in Specifications 3.5.A.1 through 3.5.A.6 specify the combinations of operable subsystems to assure the availability of the minimum cooling systems noted above.

Core spray distribution has been shown, in full-scale tests of systems similar in design to that of Peach Bottom 2 and 3, to exceed the minimum requirements by at least 25%. In addition, cooling effectiveness has been demonstrated at less than half the rated flow in simulated fuel assemblies with heater rods to duplicate the decay heat characteristics of irradiated fuel. The accident analysis is additionally conservative in that no credit is taken for spray coolant entering the reactor before the internal pressure has fallen to 105 psig.

The LPCI subsystem is designed to provide emergency cooling to the core by flooding in the event of a loss-of-coolant accident. This system functions in combination with the core spray system to prevent excessive fuel clad temperature. The LPCI subsystem and the core spray subsystem provide adequate cooling for break areas of approximately 0.2 square feet up to and including the double-ended recirculation line break without assistance from the high pressure emergency core cooling subsystems.

3.5 BASES (cont'd.)

H. Engineered Safeguards Compartments Cooling and Ventilation

One unit cooler in each pump compartment is capable of providing adequate ventilation flow and cooling. Engineering analyses indicate that the temperature rise in safeguards compartments without adequate ventilation flow or cooling is such that continued operation of the safeguards equipment or associated auxiliary equipment cannot be assured. Ventilation associated with the High Pressure Service Water Pumps is also associated with the Emergency Service Water pumps, and is specified in Specification 3.9.

I. Average Planar LHGR

This specification assures that the peak cladding temperature following the postulated design basis loss-of-coolant accident will not exceed the 2300°F limit specified in the Interim Acceptance Criteria (IAC) issued in June 1971 considering the postulated effects of fuel pellet densification.

The peak cladding temperature following a postulated loss-of-coolant accident is primarily a function of the average heat generation rate of all the rods of a fuel assembly at any axial location and is only dependent secondarily on the rod to rod power distribution within an assembly. Since expected local variations in power distribution within a fuel assembly affect the calculated peak clad temperature by less than ± 20 F relative to the peak temperature for a typical fuel design, the limit on the average linear heat generation rate is sufficient to assure that calculated temperatures are below the IAC limit.

The maximum average planar linear heat generation rates shown in Figures 3.5.1.A and 3.5.1.B are based on calculations employing the GEGAP III model described in the General Electric reports NEDO-20181, "GEGAP III, A Model for the Prediction of Pellet-Clad Thermal Conductance in BWR Fuel Rods," November 1973 with related proprietary information provided in NEDC-20181 (Proprietary), November 1973.

GEGAP III is a theoretical model which provides an exposure dependent pellet-clad gap thermal conductance by incorporating time-dependent fuel densification, time-dependent gap closure, and gap closure effects due to cladding creepdown. Validity of GEGAP III has been verified by comparison with in-reactor experimental results. The accuracy of the evaluation of fuel performance, post LOCA, was improved with the use of GEGAP III, since previous gap conductance models did not have the capability for calculating the fuel cladding gap conductance as a function of fuel lifetime.

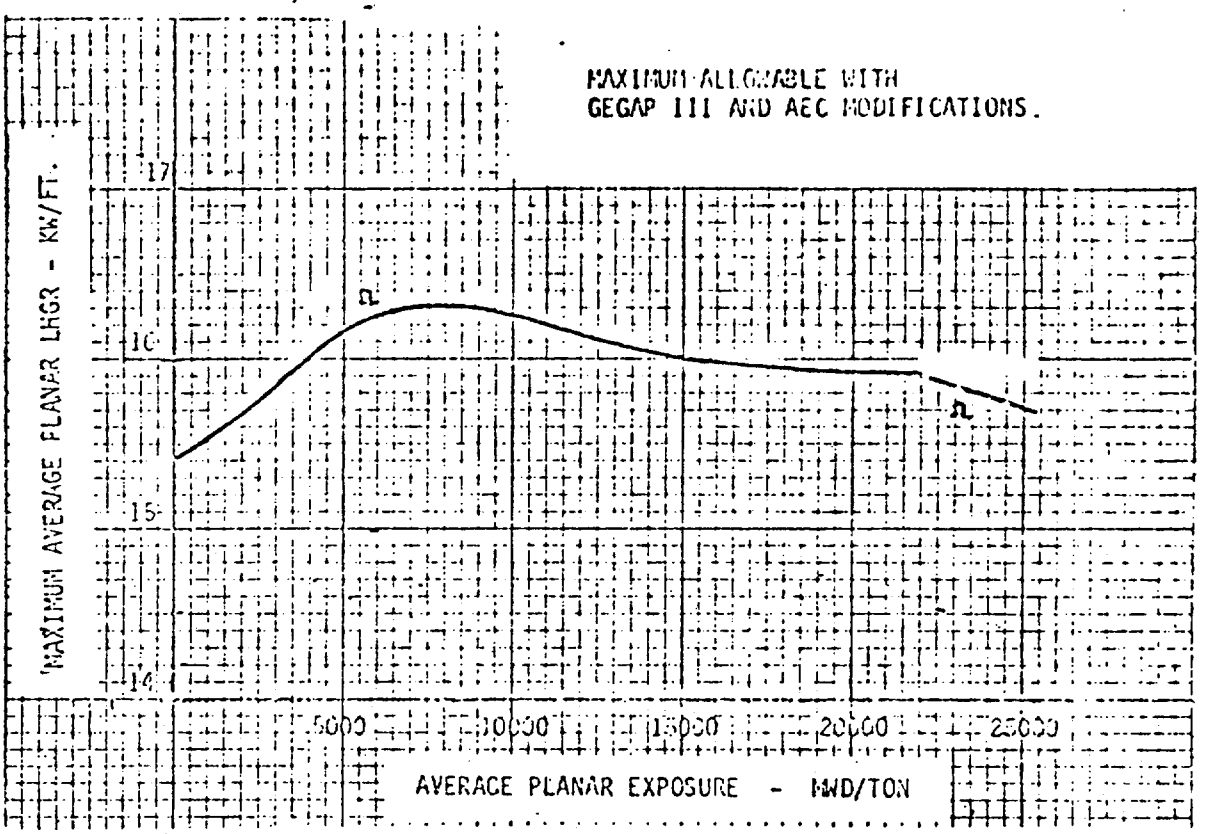
Use of the GEGAP III model yields an increase in the calculated pellet-clad gap conductance which in turn causes a decrease in the calculated stored energy in the fuel rods. A reduction in calculated stored energy reduces the calculated peak clad temperature following a postulated LOCA or, conversely, allows a compensating increase in MAPLHGR for a constant calculated peak clad temperature. The specified MAPLHGR values maintain a calculated peak clad temperature within the limitation imposed by the IAC.

J. Local LHGR

This specification assures that the linear heat generation rate in any rod is less than the design linear heat generation even if fuel pellet densification is postulated. The power spike penalty specified is based on the analysis presented in Section 3.2.1 of the GE topical report NEDM-10735 Supplement 6, and assumes a linearly increasing variation in axial gaps between core bottom and top, and assures with a 95% confidence, that no more than one fuel rod exceeds the design linear heat generation rate due to power spiking.

Figure 3.5.1.A

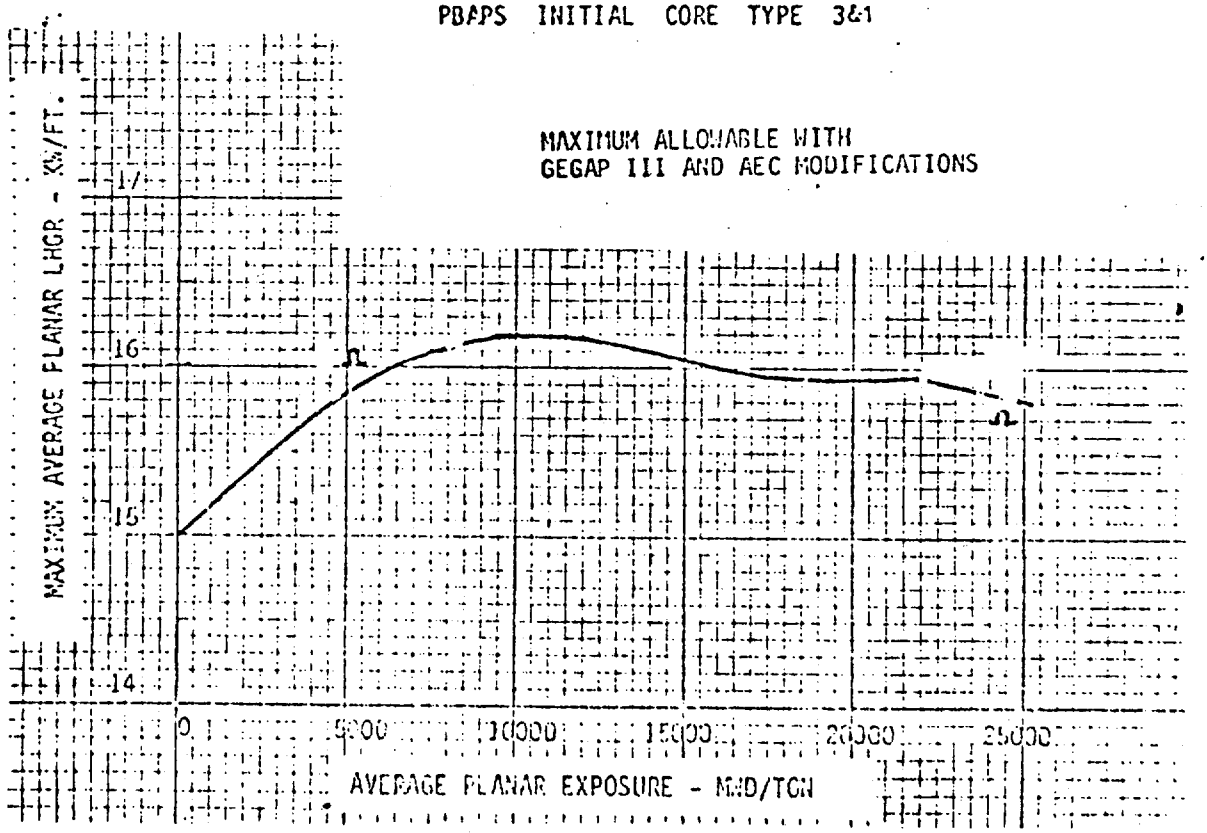
PB/PS INITIAL CORE TYPE 2



3

FIGURE 3.5.1.B

PBAPS INITIAL CORE TYPE 3&4



3

U. S. ATOMIC ENERGY COMMISSION

DOCKETS NOS. 50-277 AND 50-278

PHILADELPHIA ELECTRIC COMPANY

NOTICE OF ISSUANCE OF AMENDMENTS
TO FACILITY OPERATING LICENSES

No request for a hearing or petition for leave to intervene having been filed following publication of the notice of proposed action in the FEDERAL REGISTER on October 18, 1974 (39 F.R. 37236), the Atomic Energy Commission (the Commission) has issued Amendments Nos. 5 and 3 to Facility Operating Licenses Nos. DPR-44 and DPR-56 respectively. The licenses authorize the Philadelphia Electric Company to operate the Peach Bottom Nuclear Power Station, Units Nos. 2 and 3, located in Peach Bottom; York County, Pennsylvania. These amendments are effective as of date of issuance.

The amendments revise the provisions in the Technical Specifications relating to fuel densification. Operation of the facilities will be within the limits and restrictions of both the change to the Technical Specifications and the Emergency Core Cooling System evaluation, including proposed Technical Specifications submitted by the licensee on August 5, 1974.

The Commission has found that the application for amendments complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendments.

For further details with respect to these license amendments see Amendments Nos. 5 and 3 with Changes Nos. 6 and 3 which are available for public inspection at the Commission's Public Document Room, 1717 H Street, N. W., Washington, D. C. and at the Martin Memorial Library, 159 E. Market Street, York, Pennsylvania. A single copy of the items may be obtained upon request addressed to the U. S. Atomic Energy Commission, Washington, D. C. 20545, Attention: Deputy Director for Reactor Projects, Directorate of Licensing - Regulation.

Dated at Bethesda, Maryland, this 22nd day of November, 1974.

FOR THE ATOMIC ENERGY COMMISSION

George Lear

George Lear, Chief
Operating Reactors Branch #3
Directorate of Licensing

UNITED STATES
ATOMIC ENERGY COMMISSION
WASHINGTON, D.C. 20545

SAFETY EVALUATION BY THE DIRECTORATE OF LICENSING

SUPPORTING AMENDMENTS NOS. 5 AND 3 TO LICENSES NOS. DPR-44 AND DPR-56

(CHANGES NOS. 6 AND 3 TO THE TECHNICAL SPECIFICATIONS)

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

DOCKETS NOS. 50-277 AND 50-278

Introduction

By letter dated July 12, 1974, Philadelphia Electric Company proposed a change in the Technical Specifications of Facility Operating Licenses DPR-44 and DPR-56 for Peach Bottom Atomic Power Station, Units 2 and 3. The proposed change would replace the current maximum average planar linear heat generation rate (MAPLHGR) curves with revised curves of higher value. These revised curves were computed using the GEGAP III model for pellet-clad gap thermal conductance.

Discussion

General Electric has submitted a report NEDO-20181, "GEGAP III - A Model for the Prediction of Pellet-Clad Thermal Conductance in BWR Fuel Rods," November 1973 with related proprietary information provided in NEDC-20181 Supplement 1 (Proprietary), November 1973. GEGAP III was evaluated by the staff in their report entitled "Supplement 1 to the Technical Report on Densification of General Electric Reactor Fuels," December 14, 1973, and was determined to be suitably conservative for the evaluation of densification effects in BWR fuel.

GEGAP III is a theoretical model which provides an exposure dependent pellet-clad gap thermal conductance by incorporating time-dependent fuel densification, time-dependent gap closure, and gap closure effects due to cladding creepdown. Validity of GEGAP III has been verified by comparison with recent in-reactor experimental results. The accuracy of the evaluation of fuel performance, post-LOCA, was improved with the use of GEGAP III, since previous gap conductance models did not have the capability for calculating the fuel cladding gap conductance as a function of fuel lifetime.

The MAPLHGR is limited by the Technical Specifications to assure that the peak clad temperature during the postulated design basis loss-of-coolant accident (LOCA) will not exceed the 2300°F limit specified in the Interim Acceptance Criteria. The MAPLHR values presently contained in the Technical Specifications (and to be revised) were calculated prior to the development of the GEGAP III model.

Evaluation

Philadelphia Electric Company has recalculated the fuel temperature response to the design basis loss-of-coolant accident for Peach Bottom Atomic Power Station, Units 2 and 3 using GEGAP III and has determined new MAPLHGR curves for the three fuel types presently in use. These curves (Figures 3.5.1.A and 3.5.1.B of the revised Technical Specifications) maintain the Interim Acceptance Criteria (IAC) of 2300°F peak clad temperature during a LOCA while allowing steady state power operation at higher average planar linear heat generation rates.

Use of the GEGAP III model yields an increase in the calculated pellet-clad gap conductance which in turn causes a decrease in the calculated stored energy in the fuel rods. A reduction in calculated stored energy reduces the calculated peak clad temperature following a postulated LOCA or, conversely, allows a compensating increase in MAPLHGR for a constant calculated peak clad temperature.

The proposed MAPLHGR values, even though of higher value than currently specified in the Technical Specifications, maintain a calculated peak clad temperature within the limitation imposed by the IAC. Since the peak clad temperature is not increased during a LOCA the probability or consequences of the postulated design basis LOCA is not increased and the margin of safety is not diminished.

On August 5, 1974, Philadelphia Electric Company submitted an ECCS evaluation and proposed changes to the Technical Specifications in accordance with 10 CFR Part 50, Section 50.46. Upon submittal of the ECCS and proposed Technical Specifications, 10 CFR Part 50, Section 50.46(a)(2)(iv) required that the facility shall be operated within the limits of both the proposed and approved Technical Specifications. In order to satisfy 10 CFR Part 50, Section 50.46 operation shall, therefore, be within the limits and restrictions of both this Technical Specification change and the proposed Technical Specifications submitted on August 5, 1974, unless modified by the Director of Regulation pursuant to 10 CFR 50.46(a)(2)(v).

The Regulatory staff will, in the future, provide specific guidance in an amendment of the facility license to establish one or the other of the two analyses (the analysis using IAC with the GEGAP III model and

the analysis using Final Acceptance Criteria including GEGAP III) as the only entry in the Technical Specifications. This future amendment is dependent upon the conclusion of on-going review by the Regulatory staff.

Conclusion

We have 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 operations in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

D. M. Elliott

D. M. Elliott
Operating Reactors Branch #3
Directorate of Licensing

George Lear

George Lear, Chief
Operating Reactors Branch #3
Directorate of Licensing

Date: October 16, 1974