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March 19, 1985

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Amdt. III  
to DPR-56

Dockets Nos. 50-277 and  
50-278

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

Dear Mr. Bauer:

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3, TECHNICAL SPECIFICATION AMENDMENTS PERTAINING TO A LICENSE AMENDMENT APPLICATION DATED SEPTEMBER 14, 1984

The Commission has issued the enclosed Amendments No. 107 and 111 to Facility Operating Licenses Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station, Units Nos. 2 and 3. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated September 14, 1984.

The changes to the TSs permit the deletion of the tabular listing (Table 3.11.D.1) of snubbers in the Peach Bottom TSs as well as adding criteria to the TSs which were identified in our Generic Letter 84-13 (May 3, 1984) specifying which snubbers are required to be operable and which snubbers are exempted from the snubber operability requirements.

A copy of the Safety Evaluation is enclosed. Notice of Issuance will be included in the Commission's next monthly Federal Register notice.

Sincerely,

Original signed by

Gerald E. Gears, Project Manager  
Operating Reactors Branch #4  
Division of Licensing

Enclosures:

1. Amendment No.107 to DPR-44
2. Amendment No.111 to DPR-56
3. Safety Evaluation

cc w/enclosure:  
See next page

ORB#4:DL  
RIngram  
2/19/85

ORB#4:DL  
Gears;cr  
2/20/85

ORB#4:DL  
JStoltz  
2/22/85

OELD  
L. Finkelshteyn  
2/26/85

AD:DL  
GL:mas  
3/4/85

Philadelphia Electric Company

cc w/enclosure(s):

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Assistant General Counsel  
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Power Station  
Delta, Pennsylvania 17314

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Board of Supervisors  
Peach Bottom Township  
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Delta, Pennsylvania 17314

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Office of Inspection and Enforcement  
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Harrisburg, Pennsylvania 17120

Thomas M. Gerusky, Director  
Bureau of Radiation Protection  
Pennsylvania Department of  
Environmental Resources  
P. O. Box 2063  
Harrisburg, Pennsylvania 17120



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. 107  
License No. DPR-44

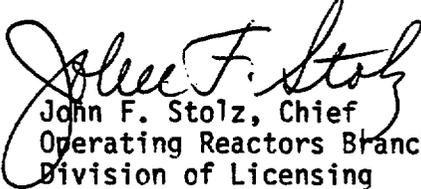
1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Philadelphia Electric Company, et al. (the licensee) dated September 14, 1984, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's 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:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 107 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

  
John F. Stolz, Chief  
Operating Reactors Branch #4  
Division of Licensing

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: March 19, 1985

ATTACHMENT TO LICENSE AMENDMENT NO.107

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 pages are identified by Amendment number and contain a vertical line indicating the area of change.

Remove

vii  
234a  
234b  
234c  
234d  
234e  
234f thru 234s  
235a  
236b

Insert

vii  
234a  
234b  
234c  
234d  
234e  
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235a  
236b

PBAPS

Unit 2

LIST OF TABLES

<u>Table</u>	<u>Title</u>	<u>Page</u>
4.8.3.c	Maximum Values for Minimum Detectable Levels of Activity	215d-6
3.14.C.1	Fire Detectors	240m
3.15	Seismic Monitoring Instrumentation	240u
3.15	Seismic Monitoring Instrumentation Surveillance Requirements	240v

Amendment No. Y02, 104, 107  
(Updated March 18, 1985),

LIMITING CONDITIONS FOR OPERATION

SURVEILLANCE REQUIREMENTS

3.11.D. Shock Suppressors (Snubbers) on Safety Related Systems

4.11.D. Shock Suppressors (Snubbers) on Safety Related Systems

3.11.D.1 During all modes of operation all snubbers on safety-related systems shall be operable except as noted in 3.11.D.2 and 3.11.D.3 below. Snubbers on non-safety related systems are excluded from this requirement if their failure or failure of the system on which installed has no adverse effect on a safety-related system.

4.11.D.1

Snubbers required to be operable under the provisions of 3.11.D.1 shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.6.G.

3.11.D.2 During operation in the cold shutdown or refueling modes, snubbers located on systems required to be operable shall be operable except as noted in 3.11.D.3.

4.11.D.2

Snubbers required to be operable under the provisions of 3.11.D.1 shall be visually inspected according to the following schedule.

3.11.D.3 With one or more snubbers inoperable under the requirements of 3.11.D.1, within 72 hours, replace or restore the inoperable snubber to the operable status and perform an engineering evaluation per specification 4.11.D.6. If these requirements cannot be met, declare the supported system inoperable and follow the applicable Limiting Condition for Operation for that System.

No. of Snubbers Found Inoperable During Inspection Period	Next Visual Inspection Period
---	-------------------------------

0	18 mo. + 25%
1	12 mo. + 25%
2	6 mo. + 25%
3,4	4 mo. + 25%
5,6,7	2 mo. + 25%
8 or more	1 mo. + 25%

The required inspection interval shall not be lengthened more than one step at a time. The provisions for extending surveillance frequency included in Section 1.0 Definitions do not apply. Snubbers may be categorized in two groups, "accessible" or "inaccessible", based on their accessibility for inspection during reactor operation. These two groups may be inspected independently according to the above schedule.

LIMITING CONDITIONS FOR OPERATIONSURVEILLANCE REQUIREMENTS

## 4.11.D.3

Visual inspection of snubbers required to be operable under the provisions of 3.11.D.1 shall verify that 1) there are no indications of damage or impaired operability, 2) attachments are secure, and 3) there is freedom of movement if this can be verified without disconnecting the snubber.

Snubbers which appear to be inoperable may be made operable for the purpose of establishing the next visual inspection interval, providing that 1) the cause of the rejection is clearly established and remedied for that particular snubber and for other generically susceptible snubbers; and 2) the affected snubber is functionally tested in the as found condition and determined operable per Specification 4.11.D.7 or 4.11.D.8, as applicable. When the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined to be inoperable for the purpose of establishing the next visual inspection interval.

## 4.11.D.4

## Functional Test

a) Once each operating cycle, during shutdown, a representative sample of 10% of each type of (mechanical or hydraulic) snubber required to be operable under the provisions of 3.11.D.1 shall be functionally tested either in place or in a bench test. For every unit found to be inoperable an additional 10% of that type of snubber shall be functionally tested until no more failures are found or all snubbers of that type have been tested. The functional test requirements for mechanical

LIMITING CONDITIONS FOR OPERATIONSURVEILLANCE REQUIREMENTS

snubbers will not take effect until the first refueling outage commencing one year after the issuance of Amendment No. 101/103 to the Technical Specifications.

b) The representative sample selected for functional testing shall include various configurations, operating environments, sizes, and capacities of snubbers. At least 25% of the sample shall include snubbers from the following categories:

1. The first snubber away from each reactor nozzle.

2. Snubbers within five feet of heavy equipment (valves, pumps, turbines, motors)

3. Snubbers connected to safety/relief valve discharge piping within 10 feet of the valve.

c) If any snubber selected for functional test either fails to lock up or fails to move, the cause shall be evaluated and if the failure is caused by manufacturing or design deficiency, all snubbers of the same design subject to the same defect shall be functionally tested. This testing requirement is independent of the requirements above for snubbers not meeting the functional test acceptance criteria.

d) Snubbers which are especially difficult to remove or are in high radiation areas during shutdown (dose greater than 100 mrem/hour) shall be included in the representative sample except for those snubbers specifically exempted by the NRC.

#### 4.11.D.5

In addition to the regular sample, snubbers required to be operable under the provisions

LIMITING CONDITIONS FOR OPERATIONSURVEILLANCE REQUIREMENTS

of 3.11.D.1 which failed the previous functional test shall be retested during the next testing cycle. If such a failed snubber was replaced, both the replacement snubber and the repaired snubber (if it had been repaired and installed in another position) shall be retested. The test results of these snubbers may not be included for the resampling of 4.11.D.4.a.

## 4.11.D.6

For snubbers required to be operable under the provisions of 3.11.D.1 found inoperable, an engineering evaluation shall be performed to determine a) mode of failure, and b) if there is any adverse effect on the supported piping or components due to the snubber inoperability.

## 4.11.D.7 Hydraulic Snubbers

Functional Test Criteria:  
Functional test shall verify that:

a) Restraining action is achieved within specified range of velocity or acceleration in both compression and tension.

b) Snubber bleed rate is within the specified range in both tension and compression. Snubbers specifically required not to displace under continuous load shall have this capability verified.

## 4.11.D.8

Mechanical Snubber  
Functional Test Criteria:  
Functional tests shall verify that:  
a) The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force. Drag force shall not have

LIMITING CONDITIONS FOR OPERATIONSURVEILLANCE REQUIREMENTS

increased more than 50% since the last functional test.

b) Restraining Action is achieved within the specified range of velocity or acceleration in both tension and compression.

c) Snubber release rate, where required, is within the specified range in compression or tension. Snubbers specifically required not to displace under continuous load shall have this capability verified.

#### 4.11.D.9

##### Service Life Monitoring

A record of the service life of each snubber required to be operable under the provisions of 3.11.D.1, the date of commencement of service life, (January 1, 1978, unless otherwise specified) and the installation and maintenance records upon which the service life is based shall be maintained.

Once each operating cycle, these records shall be reviewed to verify that no snubber service life shall be exceeded prior to the next review. If the service life will be exceeded then either recondition or replace the snubbers or re-evaluate the service life.

3.11 BASESAlternate Heat Sink

The alternate heat sink is provided as an alternate source of cooling water to the plants in the unlikely event of loss of the normal heat sink (Conowingo Pond) or the maximum credible flood. For the condition of loss of the normal heat sink, the contained volume of water (approximately 3.7 million gallons, which corresponds to a gauge reading of 17') provides a minimum of seven days cooling water to both plants for decay heat removal. The operability requirements for the alternate heat sink are specified in Specification 3.9.

C. Emergency Shutdown Control Panels

The Emergency Shutdown Control Panels are provided to assure the capability of taking the plants to the hot shutdown condition external to the control room for the unlikely condition that the control room becomes uninhabitable.

D. Shock Suppressors (Snubbers) on Safety Related Systems

Snubbers are provided to ensure that the structural integrity of the reactor coolant system and all other safety-related systems are maintained during and following a seismic or other event initiating dynamic loads.

Snubbers are designed to prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient while allowing normal thermal motion during startup and shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping as a result of seismic or other event initiating dynamic loads. It is therefore required that all snubbers necessary to protect the primary coolant system or any other safety system or components be operable during reactor operation.

Because the snubber protection is required only during low probability events a period of 72 hours is allowed for repairs or replacements. A determined effort will be made to repair the snubber as soon as possible. This allowable repair period is consistent with the allowable repair items of other safety related components such as RHR pumps, HPCI subsystems, ADS valves and diesel generators.

An engineering analysis must be performed on supported components when a snubber is determined to be inoperable. The purpose of this analysis is to assure that the supported components have not been damaged as a result of the snubber inoperability.

PBAPS

Ten percent of each type (hydraulic or mechanical) of snubber on each unit shall constitute an adequate sample.

High radiation areas (as defined in CFR 10 Part 20.202) means any area, accessible to personnel, in which there exists radiation at such levels that a major portion of the body could receive, in any one hour, a dose in excess of 100 millirem. Snubbers considered especially difficult to remove are those which because of size, weight, or geometry of installation require the use of unusual rigging equipment or arrangements for their removal, or require more than three hours of effort in their removal.

The service life of a snubber is monitored to assure that consideration is taken for the age of the expendable components. The service life is based upon manufacturer's recommendation, service conditions, maintenance history, operating experience and test and inspection results. When the review of service life records reveals that a snubber is nearing the end of its design service life, efforts are made to include that snubber in the next functional test cycle or the service life is reevaluated. The purpose of the reevaluation is to extend the service life based upon experience and information gained during operations. The results of functional testing and inspection may be used to alter the service lives of all snubbers of similar design operating under similar conditions.



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. 111  
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 September 14, 1984, 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:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 111 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

  
John F. Stolz, Chief  
Operating Reactors Branch #4  
Division of Licensing

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: March 19, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 111

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 pages are identified by Amendment number and contain a vertical line indicating the area of change.

Remove

vii  
234a  
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236b

Insert

vii  
234a  
234b  
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235a  
236b

PEAPS

Unit 3

LIST OF TABLES

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3.15	Seismic Monitoring Instrumentation	240u
4.15	Seismic Monitoring Instrumentation Surveillance Requirements	240v

LIMITING CONDITIONS FOR OPERATION

SURVEILLANCE REQUIREMENTS

3.11.D. Shock Suppressors (Snubbers) on Safety Related Systems

4.11.D. Shock Suppressors (Snubbers) on Safety Related Systems

3.11.D.1 During all modes of operation all snubbers on safety-related systems shall be operable except as noted in 3.11.D.2 and 3.11.D.3 below. Snubbers on non-safety related systems are excluded from this requirement if their failure or failure of the system on which installed has no adverse effect on a safety-related system.

4.11.D.1

Snubbers required to be operable under the provisions of 3.11.D.1 shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.6.G.

3.11.D.2 During operation in the cold shutdown or refueling modes, snubbers located on systems required to be operable shall be operable except as noted in 3.11.D.3.

4.11.D.2

Snubbers required to be operable under the provisions of 3.11.D.1 shall be visually inspected according to the following schedule.

3.11.D.3 With one or more snubbers inoperable under the requirements of 3.11.D.1, within 72 hours, replace or restore the inoperable snubber to the operable status and perform an engineering evaluation per specification 4.11.D.6. If these requirements cannot be met, declare the supported system inoperable and follow the applicable Limiting Condition for Operation for that System.

No. of Snubbers Found Inoperable During Inspection Period	Next Visual Inspection Period
---	-------------------------------

0	18 mo. + 25%
1	12 mo. + 25%
2	6 mo. + 25%
3,4	4 mo. + 25%
5,6,7	2 mo. + 25%
8 or more	1 mo. + 25%

The required inspection interval shall not be lengthened more than one step at a time. The provisions for extending surveillance frequency included in Section 1.0 Definitions do not apply. Snubbers may be categorized in two groups, "accessible" or "inaccessible", based on their accessibility for inspection during reactor operation. These two groups may be inspected independently according to the above schedule.

LIMITING CONDITIONS FOR OPERATIONSURVEILLANCE REQUIREMENTS

## 4.11.D.3

Visual inspection of snubbers required to be operable under the provisions of 3.11.D.1 shall verify that 1) there are no indications of damage or impaired operability, 2) attachments are secure, and 3) there is freedom of movement if this can be verified without disconnecting the snubber.

Snubbers which appear to be inoperable may be made operable for the purpose of establishing the next visual inspection interval, providing that 1) the cause of the rejection is clearly established and remedied for that particular snubber and for other generically susceptible snubbers; and 2) the affected snubber is functionally tested in the as found condition and determined operable per Specification 4.11.D.7 or 4.11.D.8, as applicable. When the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined to be inoperable for the purpose of establishing the next visual inspection interval.

## 4.11.D.4

## Functional Test

a) Once each operating cycle, during shutdown, a representative sample of 10% of each type of (mechanical or hydraulic) snubber required to be operable under the provisions of 3.11.D.1 shall be functionally tested either in place or in a bench test. For every unit found to be inoperable an additional 10% of that type of snubber shall be functionally tested until no more failures are found or all snubbers of that type have been tested. The functional test requirements for mechanical

LIMITING CONDITIONS FOR OPERATIONSURVEILLANCE REQUIREMENTS

snubbers will not take effect until the first refueling outage commencing one year after the issuance of Amendment No. 101/103 to the Technical Specifications.

b) The representative sample selected for functional testing shall include various configurations, operating environments, sizes, and capacities of snubbers. At least 25% of the sample shall include snubbers from the following categories:

1. The first snubber away from each reactor nozzle.
2. Snubbers within five feet of heavy equipment (valves, pumps, turbines, motors)
3. Snubbers connected to safety/relief valve discharge piping within 10 feet of the valve.

c) If any snubber selected for functional test either fails to lock up or fails to move, the cause shall be evaluated and if the failure is caused by manufacturing or design deficiency, all snubbers of the same design subject to the same defect shall be functionally tested. This testing requirement is independent of the requirements above for snubbers not meeting the functional test acceptance criteria.

d) Snubbers which are especially difficult to remove or are in high radiation areas during shutdown (dose greater than 100 mrem/hour) shall be included in the representative sample except for those snubbers specifically exempted by the NRC.

#### 4.11.D.5

In addition to the regular sample, snubbers required to be operable under the provisions

LIMITING CONDITIONS FOR OPERATIONSURVEILLANCE REQUIREMENTS

of 3.11.D.1 which failed the previous functional test shall be retested during the next testing cycle. If such a failed snubber was replaced, both the replacement snubber and the repaired snubber (if it had been repaired and installed in another position) shall be retested. The test results of these snubbers may not be included for the resampling of 4.11.D.4.a.

## 4.11.D.6

For snubbers required to be operable under the provisions of 3.11.D.1 found inoperable, an engineering evaluation shall be performed to determine a) mode of failure, and b) if there is any adverse effect on the supported piping or components due to the snubber inoperability.

## 4.11.D.7 Hydraulic Snubbers

Functional Test Criteria:  
Functional test shall verify that:

a) Restraining action is achieved within specified range of velocity or acceleration in both compression and tension.

b) Snubber bleed rate is within the specified range in both tension and compression. Snubbers specifically required not to displace under continuous load shall have this capability verified.

## 4.11.D.8

Mechanical Snubber  
Functional Test Criteria:  
Functional tests shall verify that:

a) The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force. Drag force shall not have

LIMITING CONDITIONS FOR OPERATIONSURVEILLANCE REQUIREMENTS

increased more than 50% since the last functional test.

b) Restraining Action is achieved within the specified range of velocity or acceleration in both tension and compression.

c) Snubber release rate, where required, is within the specified range in compression or tension. Snubbers specifically required not to displace under continuous load shall have this capability verified.

#### 4.11.D.9

##### Service Life Monitoring

A record of the service life of each snubber required to be operable under the provisions of 3.11.D.1, the date of commencement of service life, (January 1, 1978, unless otherwise specified) and the installation and maintenance records upon which the service life is based shall be maintained.

Once each operating cycle, these records shall be reviewed to verify that no snubber service life shall be exceeded prior to the next review. If the service life will be exceeded then either recondition or replace the snubbers or re-evaluate the service life.

3.11 BASESAlternate Heat Sink

The alternate heat sink is provided as an alternate source of cooling water to the plants in the unlikely event of loss of the normal heat sink (Conowingo Pond) or the maximum credible flood. For the condition of loss of the normal heat sink, the contained volume of water (approximately 3.7 million gallons, which corresponds to a gauge reading of 17') provides a minimum of seven days cooling water to both plants for decay heat removal. The operability requirements for the alternate heat sink are specified in Specification 3.9.

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The Emergency Shutdown Control Panels are provided to assure the capability of taking the plants to the hot shutdown condition external to the control room for the unlikely condition that the control room becomes uninhabitable.

D. Shock Suppressors (Snubbers) on Safety Related Systems

Snubbers are provided to ensure that the structural integrity of the reactor coolant system and all other safety-related systems are maintained during and following a seismic or other event initiating dynamic loads.

Snubbers are designed to prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient while allowing normal thermal motion during startup and shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping as a result of seismic or other event initiating dynamic loads. It is therefore required that all snubbers necessary to protect the primary coolant system or any other safety system or components be operable during reactor operation.

Because the snubber protection is required only during low probability events a period of 72 hours is allowed for repairs or replacements. A determined effort will be made to repair the snubber as soon as possible. This allowable repair period is consistent with the allowable repair items of other safety related components such as RHR pumps, HPCI subsystems, ADS valves and diesel generators.

An engineering analysis must be performed on supported components when a snubber is determined to be inoperable. The purpose of this analysis is to assure that the supported components have not been damaged as a result of the snubber inoperability.

PBAPS

Ten percent of each type (hydraulic or mechanical) of snubber on each unit shall constitute an adequate sample.

High radiation areas (as defined in CFR 10 Part 20.202) means any area, accessible to personnel, in which there exists radiation at such levels that a major portion of the body could receive, in any one hour, a dose in excess of 100 millirem. Snubbers considered especially difficult to remove are those which because of size, weight, or geometry of installation require the use of unusual rigging equipment or arrangements for their removal, or require more than three hours of effort in their removal.

The service life of a snubber is monitored to assure that consideration is taken for the age of the expendable components. The service life is based upon manufacturer's recommendation, service conditions, maintenance history, operating experience and test and inspection results. When the review of service life records reveals that a snubber is nearing the end of its design service life, efforts are made to include that snubber in the next functional test cycle or the service life is reevaluated. The purpose of the reevaluation is to extend the service life based upon experience and information gained during operations. The results of functional testing and inspection may be used to alter the service lives of all snubbers of similar design operating under similar conditions.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION SUPPORTING  
AMENDMENTS NOS. 107 AND 111 TO FACILITY OPERATING LICENSES 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, UNITS NOS. 2 AND 3

DOCKETS NOS. 50-277 AND 50-278

## 1.0 INTRODUCTION

By letter dated September 14, 1984, the Philadelphia Electric Company, et al. (the licensee) made application to amend the Technical Specifications (TSs) for the Peach Bottom Atomic Power Station, Units Nos. 2 and 3, to permit deletion of Table 3.11.D.1, "Safety Related Shock Suppressors," and the addition of criteria specifying which snubbers are required to be operable and which snubbers are exempted from the requirements of Section 3.11.D - Shock Suppressors (Snubbers) on Safety Related Systems. The licensee's application was made in response to the NRC staff's Generic Letter 84-13, "Technical Specifications for Snubbers," dated May 3, 1984.

## 2.0 EVALUATION

In guidance provided to licensees in its Generic Letter on snubber TSs (GL 84-13), the NRC staff indicated that it had reassessed the inclusion of snubber listings within the TSs and concluded that such listings were not necessary provided the snubber TSs are modified to specify which snubbers are required to be operable. The licensee's requested changes to the TSs would delete the tabular listings of snubbers (Table 3.11.D.1) in accordance with the above guidance. The licensee also requested the addition of criteria to Section 3.11.D. and the appropriate Bases to require all snubbers other than specified exceptions to be operable in accordance with the staff's Generic Letter Guidance.

We have reviewed the current TSs together with the proposed changes and compared these changes with the model TSs provided in Generic Letter 84-13. From our review, we conclude that these changes are in accordance with the guidance and associated model TSs provided in Generic Letter 84-13 and are, therefore, acceptable. The proposed elimination from the Peach Bottom TSs of all snubber listings in Table 3.11.D.1 is acceptable because the proposed TS changes provide additional Specifications indicating which snubbers are required to be operable and which are exempt from the requirements of Section 3.11.D in accordance with the staff's guidance in Generic Letter 84-13.

### 3.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. We have 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 these amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, these 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 these amendments.

### 4.0 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 operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Dated: March 19, 1985

The following NRC personnel have contributed to this Safety Evaluation:  
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