

March 23, 2015

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Subject: Peach Bottom Atomic Power Station, Units 2 and 3 Response to Request for Additional Information Regarding Proposed License Amendment to Revise Technical Specifications to Adopt TSTF-523

- References:**
- (1) Letter from D. P. Helker (Exelon Generation Company, LLC) to U.S. NRC, "Application to Revise Technical Specifications to Adopt TSTF-523, 'Generic Letter 2008-01, Managing Gas Accumulation,' Revision 2, using the Consolidated Line Item Improvement Process," dated July 10, 2014 (ML14191B190)
 - (2) Memorandum from R. B. Ennis (U.S. Nuclear Regulatory Commission) to D. A. Broaddus (U.S. Nuclear Regulatory Commission), "Peach Bottom Atomic Power Station, Units 2 and 3, Draft Request for Additional Information (TAC NOS. MF4410 AND MF4411)" dated February 24, 2015 (ML15056A046)

By letter dated July 10, 2014 (Reference 1), Exelon Generation Company, LLC (Exelon), requested an amendment to the Technical Specifications (TS) for Peach Bottom Atomic Power Station, Units 2 and 3 (PBAPS) to address Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," as described in TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation."

The U.S. Nuclear Regulatory Commission (USNRC) staff has been reviewing the Reference 1 submittal and has determined that additional information is needed to complete the review. The USNRC staff requested additional information on February 24, 2015 (Reference 2).

Exelon's response to the USNRC request is provided in the Attachment to this letter.

Exelon has determined that the information provided in response to this request for additional information does not impact the conclusions of the No Significant Hazards Consideration or Environmental Consideration as stated in Reference 1.

There are no regulatory commitments contained in this submittal.

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In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), Exelon is notifying the Commonwealth of Pennsylvania of this response by transmitting a copy of this letter and its attachment to the designated State Official.

Should you have any questions concerning this letter, please contact Ms. Wendy E. Croft at (610) 765-5726.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 23rd day of March, 2015.

Respectfully,



David P. Helker
Manager - Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachment: Response to Request for Additional Information Regarding Proposed License Amendment to Revise Technical Specifications to Adopt TSTF-523

cc: USNRC Region I, Regional Administrator
USNRC Project Manager, PBAPS
USNRC Senior Resident Inspector, PBAPS
Director, Bureau of Radiation Protection, PA Department of Environmental Resources
R. R. Janati, Commonwealth of Pennsylvania
S. T. Gray, State of Maryland

ATTACHMENT

**Response to Request for Additional Information Regarding
Proposed License Amendment to Revise Technical Specifications to Adopt TSTF-523**

**Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56**

Attachment

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Response to Request for Additional Information Regarding Proposed License Amendment to Revise Technical Specifications to Adopt TSTF-523

By letter dated July 10, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14191B190), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The proposed amendment would revise Technical Specification (TS) requirements to address Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," in accordance with TS Task Force (TSTF) Traveler TSTF-523, Revision 2.

USNRC Question

1. As discussed on page 2 of Attachment 1 to the application dated July 10, 2014, the licensee stated that the high pressure service water (HPSW) system components have been determined to not be required to be in the scope of a number of the surveillance requirements (SRs) due to operating experience and the design of the system.
 - a) Please describe the operating experience that justifies excluding the HPSW system from the scope of the SRs.
 - b) Please provide a description of the HPSW design in sufficient detail such that the NRC staff can independently assess the potential that gas accumulation could affect operability.

PBAPS Response to 1.a

PBAPS, Units 2 and 3 has been in operation in excess of 40 years. The HPSW pumps are functionally tested in accordance with the In-Service Testing and Surveillance Testing Programs. The HPSW System provides cooling water to the Residual Heat Removal (RHR) heat exchangers. The thermal performance of the RHR heat exchangers is periodically verified in accordance with the Station Generic Letter 89-13 Program with no abnormal performance observed indicative of air voiding. PBAPS performed a Technical Evaluation that concluded that testing for voided areas in the HPSW System is not warranted due to the system design, as described below in the response to USNRC Question 1.b.

Additionally, the scope of both Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," and TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation" do not include HPSW, or any other service water systems. For example, the TSTF-523, Section 2.3 list of affected TS Sections for NUREG-1433 (BWR/4) does not include TS Section 3.7.1, "Residual Heat Removal Service Water," which is the equivalent of PBAPS's TS Section 3.7.1 for the HPSW System.

Attachment

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PBAPS Response to 1.b

The HPSW System is used during power operations to supply cooling water to the RHR System for torus cooling, and to provide a reliable supply of cooling water for the RHR System under shutdown and post-accident conditions. The HPSW System is a safety-related, open-loop, cooling water system. A separate HPSW System serves each of PBAPS's two Units. Each Unit has four HPSW pumps separated into two subsystems with two pumps each. The HPSW pumps take suction from the Conowingo Pond through the Service Water Pump Bay, provide cooling water flow to the RHR heat exchangers, and discharge through a common pipe for each Unit to the Discharge Pond. The majority of HPSW piping is located below the ground elevation of the site. The RHR heat exchanger HPSW motor operated discharge valves are normally in the closed position. The first pump of the HPSW system is placed into service by opening the selected RHR heat exchanger HPSW motor operated discharge valve and then starting the HPSW pump. The system is secured and restored to standby by shutting down the HPSW pump and then closing the discharge valve. The HPSW System is an open-loop cooling water system and it is not designed to be water solid.