



NEI 99-04 (SECY 00-0045)

February 12, 2016

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

Peach Bottom Atomic Power Station (PBAPS), Units 1, 2 and 3
Facility Operating License No. DPR-12
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-171, 50-277 and 50-278

Subject: Annual Commitment Revision Report for the Period 1/1/15 through 12/31/15

Pursuant to SECY-00-0045 (NEI 99-04), enclosed is the 2015 Annual Commitment Revision Report.

There are no new regulatory commitments contained in this transmittal.

If you have any questions or require additional information, please contact D. J. Foss at 717-456-4311.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick D. Navin".

Patrick D. Navin
Plant Manager
Peach Bottom Atomic Power Station

cc: J. Heinly, Senior Resident Inspector, USNRC, PBAPS
R. R. Janati, Commonwealth of Pennsylvania
Document Control Desk, USNRC, Washington DC

CCN: 16-06

Attachment

2015 Annual Commitment Revision Report

**Exelon Nuclear
Peach Bottom Atomic Power Station**

**EXELON NUCLEAR
PEACH BOTTOM ATOMIC POWER STATION
UNIT 1, 2 AND 3
DOCKET NOS. 50-171, 50-277, and 50-278**

COMMITMENT REVISION REPORT

JANUARY 1, 2015 THROUGH DECEMBER 31, 2015

2015 Annual Commitment Revision Report

Letter Source: License Renewal Letters to NRC dated 7/2/01, 5/21/02 and 11/26/02

Exelon Tracking No.: T04336

Nature of Commitment: A commitment was made to an industry standard for performance of reactor water chemistry monitoring as part of the license renewal program for PBAPS

Summary of Justification:

The commitment to the reactor water chemistry industry guidelines is being upgraded to more current standards (BWRVIP-190, BWR Vessel and Internals Project, BWR Water Chemistry Guidelines – Revision 1). This document provides more proactive water chemistry guidance for mitigating IGSCC, maintaining fuel integrity and controlling radiation fields. This commitment change is considered as an enhancement to reactor water chemistry monitoring. The revised program represents the latest industry experience, knowledge and strategy in the management of reactor water, ancillary and support systems chemistry.

Letter Source: Letter to NRC dated 4/11/83 - Response to NRC Inspection Report 83-02

Exelon Tracking No.: T03308

Nature of Commitment: Perform routine surveillance to ensure that all seismically mounted bottles are identified and maintained in a seismic condition

Summary of Justification:

At the time of this commitment, additional programmatic control was warranted to ensure management of seismically secured bottles in the plant. However, as a result of modifications that reduced the number of bottles and the existence of improved plant operating practices including configuration control and control of modifications, it is no longer necessary to track the commitment to monitor the status of seismically installed bottles. Therefore, this commitment is considered to be historical in nature. The corrective actions taken were effective and the station is in compliance with NRC requirements.

Letter Source: Letter to NRC dated 12/21/94 – Response to NRC Inspection Report 94-26

Exelon Tracking No.: T03716

Nature of Commitment: Provide conservative limits and enhanced parameters to control core cooling, vessel leakage testing and monitoring of vessel temperature and pressure.

Summary of Justification:

At the time of this commitment, additional programmatic control was warranted to ensure management of core cooling, vessel leakage testing and monitoring of vessel temperature and pressure. However, since that time, improved plant operating practices including control of key plant parameters have been put into

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place. Therefore, it is no longer necessary to track the commitment. This commitment is considered to be historical in nature. The corrective actions taken were effective and the station is in compliance with NRC requirements.

Letter Source: Letter to NRC dated 7/13/07 concerning PBAPS License Amendment (269/273) regarding the implementation of Alternate Source Term (AST)

Exelon Tracking No.: T04537

Nature of Commitment: During fuel handling / core alterations, ventilation system and radiation monitor availability should be assessed with respect to filtration and monitoring of releases from the fuel. A single normal or Contingency Method to promptly close primary and secondary containment penetrations should be developed.

Summary of Justification:

The commitment was clarified to reflect PBAPS-specific design and operating practices. The AST licensing activity (amendment 269/273 dated 9/5/08) removed the requirement for Standby Gas Treatment (SGT), Secondary Containment (SC) and Secondary Containment Isolation Valves (SCIVs) to be operable while moving non-recently irradiated fuel in secondary containment. The commitment was intended to further minimize any dose impact to the public or on-site personnel by performing contingency actions in the event of a fuel handling / core alteration event. The Refueling Floor Exhaust Ventilation subsystem draws air from the refueling floor environment past radiation monitors that isolate secondary containment and initiate SGT. During time periods when fuel handling / core alterations are being performed without operability of the SCIVs, Secondary Containment and SGT, procedural controls ensure that appropriate ventilation / radiation monitoring is in place using the normal vent stack monitoring system. Means to monitor for radioactive releases include the normal installed radiation secondary containment isolation instrumentation, local area radiation monitors and radiation protection personnel job coverage for the fuel handling / core alteration evolution and vent stack rad monitoring. Additionally, the commitment was changed to clarify that the wording to close primary and secondary containment should have been only to close secondary containment since the PBAPS-specific licensing involved secondary containment. A need to close primary containment is not required based on the PBAPS plant design. There are no adverse effects on plant safety involved with this activity. This change simply ensures consistency with the intent of the original commitment.

Letter Source: Letter to NRC dated 11/16/95 concerning PBAPS Response to NRC Bulletin 95-02

Exelon Tracking No.: T03827

Nature of Commitment: Chemistry will perform sampling for visible fibrous material in suppression pool water

Summary of Justification:

PBAPS will continue to perform appropriate chemistry sampling of the suppression pool water in accordance with industry and fleet standards. Since the time that the commitment was made, emergency core cooling suction strainers have been installed to prevent material from potentially adversely affecting

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system pumps. Both of the suppression pools have been cleaned and re-coated, thereby minimizing the potential for an fibrous sources. Based on improved chemistry sampling processes, there is no need to retain the tracking of this commitment.

End of Commitment Revision Report
