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10 CFR 50.90

June 20, 2016

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: Application to Revise Technical Specifications to Adopt TSTF-501-A, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control," Revision 1, using the Consolidated Line Item Improvement Process

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Exelon Generation Company, LLC (EGC) requests an amendment to the Technical Specifications (TS) for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3.

The proposed amendment revises PBAPS Technical Specification (TS) 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," to replace the numerical volume requirements for stored diesel lube oil inventory with the requirement that a 7-day supply be available. This change is consistent with NRC approved Revision 1 to Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-501-A, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control."

EGC has concluded that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92.

The proposed change has been reviewed by the PBAPS Plant Operations Review Committee and approved by the Nuclear Safety Review Board in accordance with the requirements of the EGC Quality Assurance Program.

This amendment request contains no regulatory commitments.

Attachment 1 provides an evaluation of the proposed change. Attachment 2 provides the existing TS pages marked up to show the proposed change. Attachment 3 provides the existing Bases page marked up to show the proposed change (information only).

EGC requests approval of the proposed amendment by June 20, 2017. Once approved, the amendment shall be implemented within 60 days of issuance.

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

If you have any questions or require additional information, please contact Stephanie J. Hanson at (610) 765-5143.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 20th day of June 2016.

Respectfully,

James Barstow
Director, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachments:
1. Evaluation of Proposed Change
2. Markup of Technical Specifications Pages
3. Markup of Technical Specifications Bases Page (For Information Only)

cc:	USNRC Region I, Regional Administrator	w/ attachments
	USNRC Senior Resident Inspector, PBAPS	"
	USNRC Project Manager, PBAPS	"
	R. R. Janati, Bureau of Radiation Protection	"
	S. T. Gray, State of Maryland	"

ATTACHMENT 1

Evaluation of Proposed Change

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

Subject: **Application to Revise Technical Specifications to Adopt TSTF-501-A, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control," Revision 1, using the Consolidated Line Item Improvement Process**

1.0 DESCRIPTION

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1.0 DESCRIPTION

The proposed amendment revises PBAPS Technical Specification (TS) 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," to replace the numerical volume requirements for stored diesel lube oil inventory with the requirement that a 7-day supply be available. This change is consistent with NRC approved Revision 1 to Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-501-A, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control."

2.0 PROPOSED CHANGE

The proposed change revises TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," to replace the numerical volume requirements for stored diesel lube oil inventory with the requirement that a 7-day supply be available. The TS is modified so that the stored lube oil inventory will require that a 7-day supply be available for a diesel generator. As a result:

- Condition B in the Action table is revised. Currently, Condition B is entered when the stored diesel lube oil numerical volume requirement is not met. As discussed in the current TS Basis, the numerical volume requirement in Condition B is based on volumes less than a 7-day supply, but greater than a 6-day supply. The revision relocates the volumetric requirements from the TS and places it in the TS Bases. The TS is modified so that Condition B is entered when the stored diesel lube oil inventory is less than a 7-day supply, but greater than a 6-day supply for one or more diesel generators.

- Surveillance Requirement (SR) 3.8.3.2 is revised. Currently, SR 3.8.3.2 verifies that the stored diesel lube oil numerical volume requirement is met. As discussed in the current TS Bases, the numerical volume requirement in SR 3.8.3.2 is based on maintaining at least a 7-day supply. The revision relocates the volumetric requirements from the TS and places it in the TS Bases. The TS is modified so that SR 3.8.3.2 verifies that the stored diesel lube oil inventory is greater than or equal to a 7-day supply for a diesel generator.

Based on an NRC letter dated April 3, 2014, (Reference 3) that was issued subsequent to NRC approval of TSTF-501-A, PBAPS is not pursuing TSTF-501-A related changes for the Emergency Diesel Generator (EDG) fuel oil relocation to the TS Bases, but is only pursuing relocation of the EDG lubricating oil volume values to the TS Bases. Information in the model Safety Evaluation (SE) published in the Federal Register on May 26, 2010, (Reference 1) regarding the EDG lubricating oil is applicable to PBAPS.

The marked up TS pages that reflect the proposed change are provided in Attachment 2. For information, the marked up TS Bases page is provided in Attachment 3.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on May 26, 2010, (75 FR 29588) and TSTF-501-A, Revision 1 (Reference 2).

4.0 TECHNICAL ANAYLSIS

EGC has reviewed the model SE published in the Federal Register on May 26, 2010, (75 FR 29588) as part of the CLIIP Notice of Availability. EGC has concluded that the technical justifications presented in the SE prepared by the NRC staff are applicable to PBAPS for relocation of the EDG lubricating oil volume values from the TS to the TS Bases and therefore, justify this amendment for the incorporation of the proposed change to the PBAPS TS.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Determination

Exelon Generation Company, LLC (EGC), proposes a change to the Technical Specifications (TS), Appendix A of Renewed Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, respectively.

The proposed change revises TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," to replace the numerical volume requirements for stored diesel lube oil inventory with the requirement that a 7-day supply be available. The TS is modified so that the stored lube oil inventory will require that a 7-day supply be available for each diesel generator.

EGC has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change relocates the volume of diesel lube oil required to support 7-day operation of each onsite diesel generator, and the volume equivalent to a 6-day supply, to licensee control. The specific volume of lube oil equivalent to a 7-day and 6-day supply is based on the diesel generator manufacturer's consumption values for the run time of the diesel generator. Because the requirement to maintain a 7-day supply of diesel lube oil is not changed and is consistent with the assumptions in the accident analyses, and the actions taken when the volume of lube oil is less than a 6-day supply have not changed, neither the probability nor the consequences of any accident previously evaluated will be affected.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant

operation. The change does not alter assumptions made in the safety analysis but ensures that each diesel generator operates as assumed in the accident analysis. The proposed change is consistent with the safety analysis assumptions. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change relocates the volume of diesel lube oil required to support 7-day operation of each onsite diesel generator, and the volume equivalent to a 6-day supply, to licensee control. As the bases for the existing limits on diesel lube oil are not changed, no change is made to the accident analysis assumptions and no margin of safety is reduced as part of this change.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, EGC concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirement / Criteria

A description of the proposed TS change and its relationship to applicable regulatory requirements was provided in the NRC Notice of Availability published on May 26, 2010, (75 FR 29588). EGC has concluded that the technical justifications presented in the SE prepared by the NRC staff are applicable to PBAPS and therefore justify this amendment for the incorporation of the proposed change to the PBAPS TS.

5.3 Precedence

The proposed change to revise the PBAPS Technical Specification (TS) 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," to replace the numerical volume requirements for stored diesel lube oil inventory with the requirement that a 7-day supply be available is similar to that approved on December 22, 2015 for Duane Arnold (Reference 4). Additionally, this change is consistent with NRC approved Revision 1 to Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-501-A, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control."

6.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set

forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7.0 REFERENCES

1. Federal Register Notice, Notice of Availability published on May 26, 2010 (75 FR 29588).

2. TSTF-501-A, Revision 1, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control," dated May 28, 2010.

3. Letter from U.S. NRC to Technical Specifications Task Force, "Identification and Resolution of Issues Regarding Plant-Specific Adoption of Traveler TSTF-501, Revision, 1, 'Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control'," dated April 3, 2014 (ADAMS Accession No. ML14084A512).

4. Letter from M. L. Chawla (U.S. NRC) to T. A. Vehec (NextEra Energy Duane Arnold Energy Center), "Duane Arnold Energy Center – Issuance of Amendment to Adopt Technical Specifications Task Force (TSTF) – 501, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control" (CAC No. MF5741), dated December 22, 2015 (ADAMS Accession No. ML15310A082).

ATTACHMENT 2

Markup of Technical Specifications Pages

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

Revised Technical Specifications Pages

Unit 2 TS Page
3.8-25
3.8-27

Unit 3 TS Page
3.8-25
3.8-27

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

LCO 3.8.3 The stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

---------- NOTE ----------
Separate Condition entry is allowed for each DG.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more DGs with fuel oil level < 33,000 gal and > 29,500 gal in storage tank.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more DGs with lube oil inventory ~~< 350 gal and > 300 gal.~~ less than a 7 day supply and greater than a 6 day supply.	B.1 Restore lube oil inventory to within limits.	48 hours
C. One or more DGs with stored fuel oil total particulates not within limit.	C.1 Restore fuel oil total particulates to within limit.	7 days

(continued)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.3.1	Verify each fuel oil storage tank contains ≥ 33,000 gal of fuel.	In accordance with the Surveillance Frequency Control Program.
SR 3.8.3.2	Verify lube oil inventory is ≥ ~~350 gal.~~ a 7 day supply.	In accordance with the Surveillance Frequency Control Program.
SR 3.8.3.3	Verify fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program.	In accordance with the Diesel Fuel Oil Testing Program
SR 3.8.3.4	Verify each DG air start receiver pressure is ≥ 225 psig.	In accordance with the Surveillance Frequency Control Program.
SR 3.8.3.5	Check for and remove accumulated water from each fuel oil storage tank.	In accordance with the Surveillance Frequency Control Program.

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

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APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

---------- NOTE ----------
Separate Condition entry is allowed for each DG.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more DGs with fuel oil level < 33,000 gal and > 29,500 gal in storage tank.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more DGs with lube oil inventory ~~< 350 gal and > 300 gal.~~ less than a 7 day supply and greater than a 6 day supply.	B.1 Restore lube oil inventory to within limits.	48 hours
C. One or more DGs with stored fuel oil total particulates not within limit.	C.1 Restore fuel oil total particulates to within limit.	7 days

(continued)

SURVEILLANCE REQUIREMENTS

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SR 3.8.3.1	Verify each fuel oil storage tank contains ≥ 33,000 gal of fuel.	In accordance with the Surveillance Frequency Control Program.
SR 3.8.3.2	Verify lube oil inventory is ≥ ~~350 gal.~~ a 7 day supply.	In accordance with the Surveillance Frequency Control Program.
SR 3.8.3.3	Verify fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program.	In accordance with the Diesel Fuel Oil Testing Program
SR 3.8.3.4	Verify each DG air start receiver pressure is ≥ 225 psig.	In accordance with the Surveillance Frequency Control Program.
SR 3.8.3.5	Check for and remove accumulated water from each fuel oil storage tank.	In accordance with the Surveillance Frequency Control Program.

ATTACHMENT 3

Markup of Technical Specifications Bases Pages (For Information Only)

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

Revised Technical Specifications Bases Pages

Unit 2 TS Bases Page
B 3.8-51

Unit 3 TS Bases Page
B 3.8-51

BASES

ACTIONS (continued)

A.1

With fuel oil level < 33,000 gal in a storage tank (which includes margin for the unusable volume of oil), the 7 day fuel oil supply for a DG is not available. However, the Condition is restricted to fuel oil level reductions that maintain at least a 6 day supply (with fuel oil transfer between storage tanks). These circumstances may be caused by events such as:

a. Full load operation required for an inadvertent start while at minimum required level; or

b. Feed and bleed operations that may be necessitated by increasing particulate levels or any number of other oil quality degradations.

This restriction allows sufficient time for obtaining the requisite replacement volume and performing the analyses required prior to addition of the fuel oil to the tank. A period of 48 hours is considered sufficient to complete restoration of the required level prior to declaring the DG inoperable. This period is acceptable based on the remaining capacity (> 6 days), the fact that procedures will be initiated to obtain replenishment, and the low probability of an event during this brief period.

B.1

With lube oil inventory < 350 gal, sufficient lube oil to support 7 days of continuous DG operation at full load conditions may not be available. However, the Condition is restricted to lube oil volume reductions that maintain at least a 6 day supply. This restriction allows sufficient time for obtaining the requisite replacement volume. A period of 48 hours is considered sufficient to complete restoration of the required volume prior to declaring the DG inoperable. This period is acceptable based on the remaining capacity (> 6 days), the low rate of usage, the fact that procedures will be initiated to obtain replenishment, and the low probability of an event during this brief period.

The lube oil inventory equivalent to a 6 day supply is 300 gallons.

(continued)

BASES

ACTIONS (continued)

A.1

With fuel oil level < 33,000 gal in a storage tank (which includes margin for the unusable volume of oil), the 7 day fuel oil supply for a DG is not available. However, the Condition is restricted to fuel oil level reductions that maintain at least a 6 day supply (with fuel oil transfer between storage tanks). These circumstances may be caused by events such as:

a. Full load operation required for an inadvertent start while at minimum required level; or

b. Feed and bleed operations that may be necessitated by increasing particulate levels or any number of other oil quality degradations.

This restriction allows sufficient time for obtaining the requisite replacement volume and performing the analyses required prior to addition of the fuel oil to the tank. A period of 48 hours is considered sufficient to complete restoration of the required level prior to declaring the DG inoperable. This period is acceptable based on the remaining capacity (> 6 days), the fact that procedures will be initiated to obtain replenishment, and the low probability of an event during this brief period.

B.1

With lube oil inventory < 350 gal, sufficient lube oil to support 7 days of continuous DG operation at full load conditions may not be available. However, the Condition is restricted to lube oil volume reductions that maintain at least a 6 day supply. This restriction allows sufficient time for obtaining the requisite replacement volume. A period of 48 hours is considered sufficient to complete restoration of the required volume prior to declaring the DG inoperable. This period is acceptable based on the remaining capacity (> 6 days), the low rate of usage, the fact that procedures will be initiated to obtain replenishment, and the low probability of an event during this brief period.

The lube oil inventory equivalent to a 6 day supply is 300 gallons.

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