




UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 8, 2016

MEMORANDUM TO: Douglas A. Broaddus, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Richard B. Ennis, Senior Project Manager 
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3,
DRAFT REQUEST FOR ADDITIONAL INFORMATION (CAC NOS.
MF8010 AND MF8011)

The attached draft request for additional information (RAI) was transmitted on July 26, 2016, to Ms. Stephanie Hanson of Exelon Generation Company, LLC (Exelon, the licensee). This information was transmitted to facilitate a conference call in order to clarify the licensee's amendment request for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, dated June 20, 2016. The amendments would revise the Technical Specification (TS) 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," requirements associated with the stored inventory of lube oil for the diesel generators (DGs). Specifically, the TS inventory requirements for stored lube oil (currently specified in number of gallons) would be replaced with inventory requirements based on DG operating time (specified in number of days). The proposed changes are based on Revision 1 to Technical Specifications Task Force (TSTF) Improved Standard Technical Specifications Change Traveler TSTF-501, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control" (ADAMS Accession No. ML090510686).

On August 8, 2016, the licensee indicated that a clarification call to discuss the RAI was not needed. Exelon has agreed to provide a response to RAI by August 19, 2016.

This memorandum and the attachment do not convey or represent an NRC staff position regarding the licensee's request.

Docket Nos. 50-277 and 50-278

Attachment: Draft RAI

DRAFT REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED LICENSE AMENDMENT
DIESEL GENERATOR LUBE OIL INVENTORY REQUIREMENTS
EXELON GENERATION COMPANY, LLC
PEACH BOTTOM ATOMIC POWER STATION - UNITS 2 AND 3
DOCKET NOS. 50-277 AND 50-278

By application dated June 20, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML16173A371), Exelon Generation Company, LLC (Exelon, the licensee), submitted a license amendment request for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The amendments would revise the Technical Specification (TS) 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," requirements associated with the stored inventory of lube oil for the diesel generators (DGs). Specifically, the TS inventory requirements for stored lube oil (currently specified in number of gallons) would be replaced with inventory requirements based on DG operating time (specified in number of days). The proposed changes are based on Revision 1 to Technical Specifications Task Force (TSTF) Improved Standard Technical Specifications Change Traveler TSTF-501, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control" (ADAMS Accession No. ML090510686).

The Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed amendment and would like to discuss the following issues to clarify the submittal.

Division of Operating Reactor Licensing (DORL)

Reviewer: Rick Ennis

DORL-RAI-1

Attachment 3 to the licensee's application date June 20, 2016, provided marked up TS Bases pages (for information only) which would be implemented, in accordance with the TS Bases Control Program, as part of the proposed amendment. The proposed markup for the Bases for TS 3.8.3, Limiting Condition for Operation (LCO), Action B.1 is not consistent with the BWR/4 STS Bases markup included in TSTF-501, Revision 1. Specifically, the licensee did not propose any changes to the first sentence in this section. In addition, TSTF-501, Revision 1, includes changes to the TS Bases for SR 3.8.3.2. The licensee did not propose any Bases changes for PBAPS SR 3.8.3.2. The licensee's application did not identify these differences as proposed deviations to the TSTF. Please provide justifications for these deviations or provide a supplement with proposed TS Bases changes consistent with TSTF-501, Revision 1.

Attachment

DORL-RAI-2

The NRC's model safety evaluation for TSTF-501, Revision 1, explains the reason why licensees would want to adopt this TSTF. Specifically, the DG fuel oil numerical volume inventory requirement (in gallons) may need to be modified in order to take into account changes to the energy content (BTU/gallon) of available fuels in the market. Replacing the TS inventory requirements for stored fuel oil in gallons with inventory requirements specified in number of days of DG operating time could allow the licensee to make changes to the required number of gallons under licensee control, and therefore, may not require NRC prior approval. Since the fuel oil inventory is based on 7-days of DG operating time, the 7-day inventory requirement also applies to the DG lube oil supply.

As discussed in the licensee's application, Exelon is only proposing to adopt the TSTF-501 changes pertaining to lube oil (i.e., fuel oil changes are not proposed). The licensee's application indicated that the technical justifications in the NRC staff's model SE are applicable to the proposed changes to the lube oil requirements for PBAPS. However, given that the model SE focuses on the reasons for potential changes in fuel oil volume requirements, the NRC staff concludes that the model SE is not sufficient to address the reason for changing only the lube oil requirements. Since the nature of consumption of fuel oil and lube oil are different, it is not clear of the reason for the proposed amendment. Please provide additional justification for the reasons for the proposed amendment request (e.g., reasons why the number of gallons of lube oil, currently required in the TSs for the 7-day DG operating period, may change).

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