Exelon Generation®

200 Exelon Way
Kennett Square, PA 19348

www.exeloncorp.com

10 CFR 50.90

August 14, 2018

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: Supplemental Information to Support Application to Revise Technical Specifications to Adopt Technical Specification Task Force (TSTF)-500, Revision 2, "DC Electrical Rewrite Update to TSTF-360"

Reference: Letter from James Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission – "Application to Revise Technical Specifications to Adopt Technical Specification Task Force (TSTF)-500, Revision 2, "DC Electrical Rewrite Update to TSTF-360,'" dated September 29, 2017 (ML17275A069)

By letter dated September 29, 2017 (Reference), Exelon Generation Company, LLC (Exelon) submitted an amendment request to the U.S. Nuclear Regulatory Commission (NRC) to support changes to the Renewed Facility Operating License (RFOL) Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, respectively. The Reference submittal requested changes to the PBAPS, Units 2 and 3, Technical Specifications (TS) consistent with the NRC-approved Technical Specifications Task Force (TSTF) Traveler TSTF-500, Revision 2, "DC Electrical Rewrite-Update to TSTF-360."

Subsequently, during the review of the proposed revised TS pages associated with the changes, minor discrepancies were identified on a mark-up TS page for Units 2 and 3 (i.e., 3.8-29a) and a TS Bases page for Unit 3 (i.e., B 3.8-63b). These discrepancies are considered editorial in nature and involve revising the unit number designation in TS Section 3.8.4, Condition E and Required Action E.1 on the Unit 3 page along with removing an inadvertent punctuation mark (i.e., period) in Condition E on both the Unit 2 and Unit 3 TS pages. The Unit 3 TS Bases mark-up page was revised to correct the unit number designation referenced in E.1.

Exelon is submitting this supplemental information to correct the editorial discrepancies identified on the proposed TS and Bases page mark-ups supporting this amendment request. Attachment 1 to this letter provides copies of the updated mark-up TS pages for Units 2 and 3. Attachment 2 provides a copy of the updated mark-up of the Unit 3 TS Bases page for information only. The updated TS and Bases pages provided in this submittal supersede the mark-ups for the affected pages previously submitted in the Reference letter.

Exelon has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, that were previously provided to the NRC in Attachment 1 of the Reference 1 letter. Exelon has concluded that the information provided in this response does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92. In addition, Exelon has concluded that the information in this response does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There are no regulatory commitments in this submittal.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), Exelon is notifying the Commonwealth of Pennsylvania of this supplemental response 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 Frank Mascitelli at 610-765-5512.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 14th day of August 2018.

Respectfully,

D. P. Helker

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

Attachments:

Updated Technical Specification Page Mark-ups (Page 3.8-29a both units)
Updated Technical Specification Bases Page Mark-up (Unit 3 Page B 3.8-63b - For Information Only)

cc: w/ Attachment
Regional Administrator - NRC Region I
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station
NRC Project Manager, NRR - Peach Bottom Atomic Power Station
Director, Bureau of Radiation Protection – Pennsylvania Department of Environmental Protection
R. R. Janati, Pennsylvania Bureau of Radiation Protection
D. A. Tancabel, State of Maryland

ATTACHMENT 1

License Amendment Request

Peach Bottom Atomic Power Station, Units 2 and 3
Docket Nos. 50-277 and 50-278

Supplemental Information to Support Application to Revise Technical Specifications to Adopt Technical Specification Task Force (TSTF)-500, Revision 2, "DC Electrical Rewrite Update to TSTF-360"

Updated Technical Specification Pages

Unit 2 - TS Page 3.8-29a
Unit 3 - TS Page 3.8-29a

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
~~C~~E. One Unit 2 DC electrical power subsystem inoperable~~,~~ ~~f~~For reasons other than conditions C, or D.	~~C~~E.1 Restore Unit 2 DC electrical power subsystem to OPERABLE status.	2 hours
~~D~~F. Required Action and Associated Completion Time of Condition A, B, C, D, or E not met.	~~D~~F.1 Be in MODE 3. AND F.2 Be in MODE 4.	12 hours 36 hours
~~E~~G. Two or more inoperable DC electrical power subsystems.	~~E~~G.1 Enter LCO 3.0.3.	Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
~~C~~E. One Unit ~~2~~3 DC electrical power subsystem inoperable ~~f~~For reasons other than conditions C, or D.	~~C~~E.1 Restore Unit ~~2~~3 DC electrical power subsystem to OPERABLE status.	2 hours
~~D~~F. Required Action and Associated Completion Time of Condition A, B, C, D, or E not met.	~~D~~F.1 Be in MODE 3. AND F.2 Be in MODE 4.	12 hours 36 hours
~~E~~G. Two or more inoperable DC electrical power subsystems.	~~E~~G.1 Enter LCO 3.0.3.	Immediately

ATTACHMENT 2

License Amendment Request

Peach Bottom Atomic Power Station, Units 2 and 3
Docket Nos. 50-277 and 50-278

Supplemental Information to Support Application to Revise Technical Specifications to Adopt Technical Specification Task Force (TSTF)-500, Revision 2, "DC Electrical Rewrite Update to TSTF-360"

Updated Technical Specification Pages

Unit 3 - TS Bases Page B 3.8-63b

BASES

ACTIONS

D.1 (continued)

Condition D represents one subsystem with one battery inoperable. With one battery inoperable, the DC bus is being supplied by the OPERABLE battery charger. Any event that results in a loss of the AC bus supporting the battery charger will also result in loss of DC to that subsystem. Recovery of the AC bus, especially if it is due to a loss of offsite power, will be hampered by the fact that many of the components necessary for the recovery (e.g., diesel generator control and field flash, AC load shed and diesel generator output circuit breakers, etc.) likely rely upon the battery. In addition the energization transients of any DC loads that are beyond the capability of the battery charger and normally require the assistance of the battery will not be able to be brought online. The 2 hour limit allows sufficient time to effect restoration of an inoperable battery given that the majority of the conditions that lead to battery inoperability (e.g., loss of battery charger, battery cell voltage less than 2.07 V, etc.) are identified in Specifications 3.8.4, 3.8.5, and 3.8.6 together with additional specific completion times.

~~C~~E.1

Condition ~~C~~E represents one Unit ~~2~~3 ~~division~~ subsystem with a loss of ability to completely respond to an event, and a potential loss of ability to remain energized during normal operation. It is therefore imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for complete loss of DC power to the affected subsystem. The 2 hour limit is consistent with the allowed time for an inoperable DC Distribution System Subsystem.

If one of the Unit ~~2~~3 DC electrical power subsystems is inoperable for reasons other than conditions C, or D, (e.g., ~~inoperable battery/batteries, inoperable required battery charger/chargers, or~~ inoperable ~~required~~ battery charger~~/chargers~~ and associated inoperable battery~~/batteries~~), the remaining DC electrical power subsystems have the capacity to support a safe shutdown and to mitigate an accident condition. Since a subsequent worst case single failure could result in the loss of minimum necessary DC electrical subsystems to mitigate a worst case accident, continued power operation should not exceed 2 hours. The 2 hour Completion Time is consistent with Regulatory Guide 1.93 (Ref. 4) and reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power division and, if the Unit ~~2~~3 DC electrical power division is not restored to OPERABLE status, to prepare to initiate an orderly and safe unit shutdown. The 2 hour limit is also consistent with the allowed time for an inoperable Unit ~~2~~3 DC Distribution System Subsystem.

(continued)