



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENTS NOS. 71 AND 69 TO FACILITY OPERATING LICENSES NOS. DPR-44 AND DPR-56

PHILADELPHIA ELECTRIC COMPANY  
PUBLIC SERVICE ELECTRIC AND GAS COMPANY  
DELMARVA POWER AND LIGHT COMPANY  
ATLANTIC CITY ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION, UNITS NOS. 2 AND 3

DOCKETS NOS. 50-277 AND 50-278

I. Introduction

By letter dated May 20, 1980, Philadelphia Electric Company (licensee) requested amendments to Facility Operating Licenses Nos. DPR-44 and 56 for the Peach Bottom Atomic Power Station, Units Nos. 2 and 3. The proposed amendments involve: (1) clarification of the definition Operable, (2) addition of general Limiting Conditions for Operation (LCOs) and (3) addition of action statements for certain specifications. The licensee's application is in response to the NRC staff's request dated April 10, 1980.

II. Evaluation

1. Definition - Operable

The NRC staff requested the licensee to revise the definition of Operable to implicitly state that a system is capable of performing its specified function when all necessary instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system to perform its function are also capable of performing their related support function.

We have reviewed the licensee's submittal and determined that this requested change is consistent with our request and is therefore acceptable.

2. General LCOs

LCOs are specified for each safety related system in the plant, and with few exceptions, the ACTION statements address single outages of components, trains or sub-systems. For any particular system, the LCO does not address multiple outages of redundant components, nor does it address the effects of outages of any support system - such as electrical power or cooling water. This is because of the large number of combinations of these types of outages that are possible. Therefore, the NRC staff's April 10, 1980 letter requested the licensee to incorporate general LCOs to assure that no set of equipment outages would be allowed to persist that would

result in the facility being in an unprotected condition. One of the general LCOs specifies the action to be taken for circumstances in excess of those addressed in a specific system specification. The second general LCO addresses the situation for which a system would be declared inoperable solely because its normal or emergency power source is inoperable. Sample specifications were provided in the NRC staff's request. We have reviewed the licensee's proposed addition of general LCOs and determined that they are consistent with the guidance furnished. Therefore, this change is acceptable.

### 3. Additional Action Statements

The licensee's request also included the addition of action statements for those currently approved specifications that do not specifically address outages of components or systems. The licensee's request was based on the Standard Technical Specifications for General Electric Boiling Water Reactors, NUREG-0123, Rev. 1. The action statements involve the (a) reactor protection system (RPS) response time, (b) reactor coolant chemistry, (c) secondary containment integrity and (d) instrumentation for monitoring river water level.

We have reviewed the licensee's request and determined that the proposed additions for items (b) and (c) above are totally consistent with our standard specifications and are acceptable.

For item (a) the licensee proposed an action statement that would permit continued operability for RPS response times in excess of 100 msec provided that a safety evaluation approved by both the on-site and off-site review committee, indicated that safety limits (specified elsewhere in the Technical Specifications) would not be exceeded. During our review we discussed this aspect with the licensee and indicated that operation with response times in excess of 100 msec would require preapproval by the NRC staff. He agreed to a modified action statement. Therefore, we have determined that this change as modified by the NRC staff is consistent with our requirements and is acceptable.

For item (d) we have reviewed the licensee's submittal and determined that the requested change is unique to the Peach Bottom Technical Specifications. Current requirements for LCOs and surveillance associated with intake structures specify minimum river levels (as a source for service water systems) and maximum levels (for flood protection). Surveillance requirements do not require active monitors of river level. We have determined that our present requirements are included in the Peach Bottom specifications which are unaffected by the proposed change. Therefore, the proposed action statement for inoperable instrumentation is acceptable.

The only other change authorized by the amendments supported by this evaluation is a deletion of obsolete notes regarding inerting makeup system requirements prior to the first Peach Bottom refueling outage. This deletion is pro forma in nature and is acceptable.

### III. Environmental Considerations

We have determined that the amendments do not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have

further concluded that the amendments involve an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of these amendments.

#### IV. Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendments do not involve a significant increase in the probability or consequences of accidents previously considered and do not involve a significant decrease in a safety margin, the amendments do not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Dated: July 15, 1980