BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of	:	
	:	Docket Nos. 50-277
PHILADELPHIA ELECTRIC COMPANY	:	50-278

APPLICATION FOR AMENDMENT

OF

FACILITY OPERATING LICENSES

DPR-44 & DPR-56

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Attorneys for
Philadelphia Electric Company

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Philadelphia Electric Company, Licensee under Facility Operating Licenses DPR-44 and DPR-56 for Peach Bottom Units 2 and 3, hereby requests that the Technical Specifications contained in Appendix A of the Operating Licenses be amended by revising certain sections as indicated by a vertical bar in the margin of attached pages 77, 78, 86, 245, and 246, and by the addition of page 263.

Correspondence from Mr. D. G. Eisenhut, Director, Division of Licensing, NRC, to All Boiling Water Reactor Licensees, dated July 2, 1980, requested the Licensee to submit a license amendment application incorporating certain TMI Lessons

Learned Category "A" requirements. These requirements involve water level instrumentation, safety-relief valve position indication, diverse containment isolation valve signals, Shift Technical Advisor, system integrity measurement program, and iodine measurement capability. A model Technical Specifications accompanied the July 2, 1980 letter for the stated purpose of providing guidance in the Licensee's preparation of the amendment application.

The letter from Mr. D. G. Eisenhut requests a Table of Containment Isolation Valves which reflect the current diverse isolation signal design. The Licensee committed to adding additional containment isolation valves, and adding automatic isolation signals to existing valves in correspondence from S. L. Daltroff to H. R. Denton, dated January 2, 1980. The modifications involve containment isolation capabilities associated with the Radioactive Gas Sample line and the Instrument Nitrogen suction line. Accordingly, the Licensee submitted an amendment application on July 16, 1980, requesting that the containment isolation valve tables 3.7.1, page 180, and 3.7.4, pages 186 and 187, be revised to reflect these modifications. The previous amendment application should provide a satisfactory response on this request and is therefore not repeated in this amendment application.

Appendix A to the Peach Bottom Operating License, page 86, currently specifies surveillance requirements for the reactor water level instrumentation that is more conservative than the guidance provided in the July 2, 1980 letter and is therefore

left unchanged. However, the Licensee requests a revision to Table 3.2.F, page 77 and 78 to bring the operability requirements for the reactor water level instrumentation into agreement with the NRC guidelines presented in the July 2, 1980 letter.

The July 2, 1980 letter from Mr. Eisenhut identified main steam safety relief valve position instrumentation operability and surveillance requirements. The Peach Bottom main steam system has eleven safety/relief valves and two safety valves per unit. Each valve is instrumented with a primary (acoustics) and backup (thermocouple) position detector. The Licensee proposes monthly instrument checks for both the primary (acoustic) and the backup (thermocouple) position detectors and once per operating cycle calibration of the primary (acoustic) position detectors. Thermocouple accuracy is not necessary for its application as a backup valve position detector due to the large incremental temperature increase associated with an open safety/relief or safety valve. Therefore, the Licensee proposes that the surveillance requirement for the backup (thermocouple) valve position detector be limited to a monthly instrument check and an instrument functional test once per operating cycle. The instrument functional test verifies that the thermocouple sensor responds to rising temperature.

The Model Technical Specifications require a plant shutdown in the event that one of the twenty-six safety relief and safety valve position detectors per unit is determined to be inoperable. The Licensee believes that this requirement is excessively stringent in view of the minimal safety significance

of unavailability of these detectors, and the potentially significant adverse impact of this requirement on plant availability. The safety significance of the safety/relief valve and safety valve position detectors is minimal for the following reasons:

1. The reliability and performance of the safety/relief and safety valves is independent of the operability of the valve position detectors.

2. There are many other indications of an open valve, in addition to the valve position detectors, which include the following measured parameters: torus water temperature, torus water level, and drywell pressure and temperature.

3. A stuck open safety/relief valve is not an event of great significance in the BWR Design as demonstrated by many reactor years of experience. A stuck open valve condition has essentially no effect on forced or natural circulation capabilities. Their discharges are piped to the containment suppression pool. Because of the submerged discharge, high containment pressure and temperatures are avoided, and coolant inventory conserved.

4. A stuck open safety valve will cause a rapid rise in containment pressure, promptly causing a scram and ECCS initiation. The effect of a stuck-open valve is identical to a small main steam line break. The operator has no capability of attempting to re-seat a stuck open safety valve from the control room and his actions would be identical to those for a main steam line break.

Accordingly, the Licensee proposes, based on the above rationale, to limit the amendment to surveillance requirements of the safety/relief and safety valves as shown on the accompanying page 86 of the Technical Specifications.

The Shift Technical Advisor staffing requirements are shown on page 245 and 246 and are consistent with NUREG 0578, TMI-2 Lessons Learned Requirements.

Administrative requirements regarding system integrity measurement program, and iodine measurement capability are presented on the accompanying page 263.

Pursuant to 10 CFR 170.22, "Schedule of Fees for Facility License Amendments", Philadelphia Electric Company proposes that this Application for Amendment be considered a Class III Amendment for Unit 2, and a Class I Amendment for Unit 3, since the proposed changes are deemed not to involve a significant hazards consideration.

The Plant Operation Review Committee and the Operation and Safety Review Committee have reviewed these proposed changes to the Technical Specifications, and have concluded that they do not involve an unreviewed safety question or a significant hazard consideration; and will not endanger the health and safety of the public.

Respectfully submitted,

V. S. Boyer

Senior Vice President

COMMONWEALTH OF PENNSYLVANIA :

ss.

COUNTY OF PHILADELPHIA :

V. S. Boyer, being first duly sworn, deposes and says:

That he is Senior Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating Licenses and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

V. S. Boyer

Subscribed and sworn to
before me this 11th day
of September, 1980

Elizabeth H. Boyer
Notary Public

ELIZABETH H. BOYER
Notary Public, Phila., Phila. Co.
My Commission Expires Jan. 30, 1982

CERTIFICATE OF SERVICE

I certify that service of the foregoing Application was made upon the Board of Supervisors, Peach Bottom Township, York County, Pennsylvania, by mailing a copy thereof, via first-class mail, to Albert R. Steele, Chairman of the Board of Supervisors, R. D. No. 1, Delta, Pennsylvania 17314; upon the Board of Supervisors, Fulton Township, Lancaster County, Pennsylvania, by mailing a copy thereof, via first-class mail, to George K. Brinton, Chairman of the Board of Supervisors, Peach Bottom, Pennsylvania 17563; and upon the Board of Supervisors, Drumore Township, Lancaster County, Pennsylvania, by mailing a copy thereof, via first-class mail, to Wilmer P. Bolton, Chairman of the Board of Supervisors, R. D. No. 1, Holtwood, Pennsylvania 17532; all this 15th day of September, 1980.

Eugene J. Bradley

Attorney for
Philadelphia Electric Company