

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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Philadelphia Electric Company

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Philadelphia Electric Company, Licensee under Facility Operating Licenses DPR-44 and DPR-56 for Peach Bottom Atomic Power Station Units No. 2 and 3, hereby requests that the Technical Specifications incorporated 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 35, 133c, and 142c for Peach Bottom Unit No. 2 and pages 35, 142b, 142c, and 142e for Peach Bottom Unit No. 3.

The changes to the Technical Specifications are being requested to: 1) expand the Maximum Average Planar Linear Heat Generation Rate (MAPLHGR) limits over an increased planar average

exposure range for reload fuel assemblies and the Pressurized Test Assembly (PTA), 2) change the Technical Specification Reactor Protection System (RPS) response time from 100 milliseconds to 50 milliseconds, and 3) modify the MCPR operating limits to reflect the use of 50 milliseconds in the safety analysis.

The changes requested herein would incorporate MAPLHGR limits for Peach Bottom Unit 2 Reload 1 fuel bundles (8D274L) out to an average planar exposure of 40,000 MWD/ST. The proposed amendment would also incorporate MAPLHGR limits for Peach Bottom Unit 3 Reload 1 fuel bundles (8D274L), Peach Bottom 3 Reload 1 fuel bundles (8D274H), and the Pressurized Test Assembly (PTA) out to an average planar exposure of 40,000 MWD/ST. These changes would provide for continued monitoring of the above fuel assemblies to assure operation within MAPLHGR limits.

The basis for the above MAPLHGR changes are set forth in the attached documents entitled "Errata and Addenda Sheet No. 6, LOCA Analysis for Peach Bottom Atomic Power Station Unit 2, NEDO-24081, June 1980", and "Errata and Addenda Sheet No. 2, LOCA Analysis for Peach Bottom Atomic Power Station Unit 3, NEDO 24082, June 1980. These documents serve to update the referenced LOCA Analysis documents (NEDO 24081 and NEDO 24082) and are filed herewith and incorporated herein by reference.

In addition, the MAPLHGR table for the Peach Bottom 3 Reload 3 fuel bundles (P8DRB284-7G4.0), which was initially incorporated into the Reload 3 reload licensing submittal

document, NEDO-24204A, has also been included in the amendment to the Peach Bottom 3 ECCS document.

The changes requested herein would modify Peach Bottom 2 and 3 Technical Specification 3.1 (Limiting Condition of Operation) with respect to the Reactor Protection System (RPS) delay time. This Technical Specification currently specifies that the RPS scram circuit delay time, i.e., the time between the opening of the sensor contact up to and including the opening of the trip actuator should not exceed 100 milliseconds. Peach Bottom 2 and 3 Technical Specification Bases 2.1 (paragraph 3) indicates that for safety analysis purposes the scram circuit delay time allowed by safety analyses is conservatively set equal to the longest delay permitted by the Technical Specifications which would be the Limiting Condition of Operation value of 100 millisecond. Because both the Peach Bottom 2 Reload 4 (NEDO-24237) and Peach Bottom 3 Reload 3 (NEDO-24204A) safety analysis were performed using a 50 millisecond RPS scram delay value, Philadelphia Electric proposes that Technical Specification 3.1 be changed to indicate that the RPS scram circuit delay time should not exceed 50 milliseconds. This proposal acknowledges NRC IE Circular No. 80-05, "BWR Technical Specification Inconsistency - RPS Response Time". In accordance with NRC IE Circular No. 80-05, Philadelphia Electric Company: (1) has verified that the actual RPS response time in the most recent test is less than the value specified in the safety analysis (50 milliseconds), (2) has and will continue to observe the RPS response time specified in the safety analysis (50 milliseconds)

until the Technical Specification is approved, and (3) has taken appropriate actions to make the Technical Specification on RPS response time consistent with the RPS response time used in the safety analysis. The basis for an RPS scram circuit delay of 50 milliseconds is included herein as Attachment A.

The proposed change modifies our previous plan for resolving the Technical Specification RPS response time inconsistency. This plan was transmitted to the NRC in the following letters:

Peach Bottom 2 Letter, S. L. Daltroff to T. A. Ippolito,
dated 4/28/80, "Peach Bottom 2 Reload 4
Application for Amendment of Facility
Operating License DPL-44"

Peach Bottom 3 Letter, M. J. Cooney to B. H. Grier,
dated 4/23/80, "Reactor Protection
System (RPS) Delay Time"

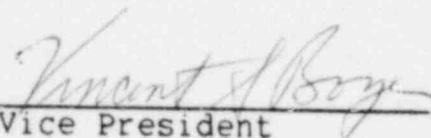
In the above noted Peach Bottom 2 plan (4/28/80), we requested a modification to the End of Cycle (EOC) 5 MCPR operating limits based on the use of a 100 millisecond RPS delay time. These limits were approved for Peach Bottom 2 by the NRC on 6/13/80 in Amendment No. 70 to Facility Operating License No. DPR-44. In the above noted Peach Bottom 3 plan (4/23/80), it was indicated that an amendment to the Peach Bottom 3 EOC 4 MCPR operating limits based on the use of the 100 millisecond RPS delay value in the reload safety analysis would be requested. Because a 50 millisecond RPS delay time was used in both Peach Bottom 2 and Peach Bottom 3 safety analysis, and because of our proposal for

amendment to Technical Specification 3.1.B, it is proposed that the Peach Bottom 2 EOC5 MCPR operating limits be modified to those based on the 50 millisecond RPS delay value (attached). With regard to Peach Bottom 3 EOC 4, it is proposed that the values currently provided by the Technical Specifications remain unchanged since those values are the same as those provided in NEDO-24204A (Supplemental Reload Licensing Submittal for Peach Bottom 3 Reload 3).

Pursuant to 10 CFR 170.22, Philadelphia Electric Company, for fee purposes, proposes that the 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 hazards consideration, and will not endanger the health and safety of the public

Respectfully submitted,


Vice President

COMMONWEALTH OF PENNSYLVANIA

:

SS.

COUNTY OF PHILADELPHIA

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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.

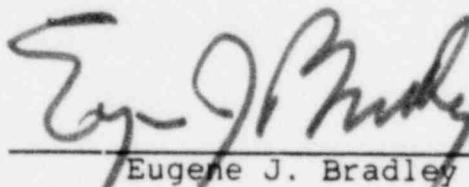
V. S. Boyer

Subscribed and sworn to
before me this 29th 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 30th day of September, 1980.



Eugene J. Bradley

Attorney for
Philadelphia Electric Company