

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of	:	
	:	Docket No. 50-278
PHILADELPHIA ELECTRIC COMPANY	:	

APPLICATION FOR AMENDMENT  
OF  
FACILITY OPERATING LICENSE  
DPR-56

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Philadelphia Electric Company, Licensee under Facility Operating License DPR-56 for Peach Bottom Unit 3, hereby requests that the Technical Specifications contained in Appendix A of the Operating License be amended by revising certain sections as indicated by a vertical bar in the margin of attached pages iv, vi, 4, 9, 10, 11, 13, 14, 17, 19, 20, 21, 24, 31, 33, 40, 74, 91, 92, 103, 104, 111, 133a, 133b, 133c, 133d, 140, 140a, 140b, 140c, 140d, 142f, 142g, 152a, 157, and 241. The information on pages 140e, 142, and 142a has been deleted. Page numbers 142 and 142a, however, have been re-issued with new information. Page numbers 133e, 142h, and 142i are new pages.

The changes to the Technical Specifications are being requested to: (1) accommodate the fourth refueling of the Peach Bottom Unit 3 reactor, (2) identify the operating limits for all fuel types for cycle 5 operation, (3) permit the continued use of the fast scram control rod drive during cycle 5, (4) permit continued operation of the Pressurized Test Assembly (PTA) after re-constitution with six (6) new fuel rods, (5) incorporate the 67B control rod drive scram times, (6) accommodate implementation of ODYN transient analysis code into reload licensing, (7) delete certain Technical Specification Bases LOCA information which is redundant to information contained in other previously submitted documents, (8) incorporate MAPLHGR limits for the Reload 4 fuel and extended exposure MAPLHGR limits for the Reload 2 and Reload 3 fuel, (9) add generic MAPLHGR curve for P8x8R fuel to reduce need for future cycle-dependent revisions, and (10) modify references given in the Bases regarding reload safety evaluations.

An analysis of the safety considerations involved in the reactor refueling and the cycle 5 operating limits for all fuel types is set forth in a document entitled "Supplemental Reload Licensing Submittal for Peach Bottom Atomic Power Station Unit 3 Reload 4" (Y1003J01A20) February, 1981, which is filed herewith and incorporated herein by reference.

An analysis of the safety considerations involved in continuing the use of the fast scram control rod drive (FSCRD) during cycle 5 is set forth in a document entitled "General Electric Boiling Water Reactor Reload 1 Licensing Amendment for Peach Bottom Atomic Power Station Unit No. 3, Fast Scram Control

Rod Drive Third Supplement" (NEDO-21363-3) February, 1981, which is filed herewith and incorporated herein by reference.

In addition, the changes requested herein would permit the continued operation of the Pressurized Test Assembly (PTA) which was initially inserted into the Peach Bottom 3 reactor during the Spring, 1977, Reload 1 refueling. This PTA will be inspected and re-configured during the Peach Bottom 3 Reload 4 refueling outage. A total of six (6) irradiated fuel rods will be removed and replaced with new fuel rods prior to bundle re-insertion for Cycle 5 operation. The purpose of continued PTA operation is to obtain fission gas measurements from the PTA in conjunction with the fuel extended exposure program. The estimated PTA bundle average exposure at the Spring, 1981, refueling outage is approximately 26 GWD/MT. An additional cycle of operation will extend the fuel bundle average exposure to approximately 34 GWD/MT, with a peak pellet exposure approaching 44 GWD/MT. An analysis of the safety considerations involved in continuing the use of the PTA is set forth in appendix F of document Y1003J01A20.

The amendment request proposes that the 67B control rod drive (CRD) scram times be incorporated into the Technical Specifications. The 67B CRD scram times, in replacing the 67A scram times, require a 3.5 second average scram insertion time, rather than 5.0 second average scram insertion time (67A), for the 90% inserted from the fully withdrawn position. This change is proposed to be in conformance with the reload-unique transient analysis inputs utilized in the aforementioned document Y1003J01A20.

The amendment request changes provide for the implementation of the ODYN transient analysis code for analysis of rapid pressurization and over-pressure protection events as set forth in the "Supplemental Reload Licensing Submittal for Peach Bottom Atomic Power Station Unit 3 Reload 4" (Y1003J01A20). The MCPR's calculated for the pressurization events analyzed with ODYN have been adjusted in accordance with Option B of the ODYN implementation plan. In the event that the Option B scram time specification is not met, a linear interpolation between the Option A MCPR and the Option B MCPR will be performed. Both the Option A and Option B cycle MCPR values and implementation procedure including ODYN Option B MCPR Scram Insertion Time Conformance Procedure are incorporated herein as described in the letter dated September 5, 1980, R.H. Buchholz (General Electric) to P. S. Check (U.S. NRC), "Response to NRC Request for Information on ODYN Computer Model."

The proposed changes requested on pages 13, 14, 140a, and deletion of page 140e would delete certain portions of the Bases of the Technical Specifications that contain information which is redundant to information contained in General Electric documents NEDE-24011-P-A, "General Electric Boiling Water Reactor Generic Reload Fuel Application" and NEDO 24082, "Loss-of-Coolant Accident Analysis for Peach Bottom Atomic Power Station Unit 3." The proposed changes to the Bases eliminate the necessity of revising these sections of the Technical Specifications for each reload.

The proposed changes incorporate MAPLHGR limits for the Reload 4 fuel and extended exposure MAPLHGR limits for the Reload



2 and Reload 3 fuel. An analysis of the safety considerations involved in these MAPLHGR limits is set forth in a document entitled "Loss of Coolant Accident Analysis for Peach Bottom Atomic Power Station Unit 3," Errata and Addenda Number 3 and 4 to NEDO-24082, which are filed herewith and incorporated herein by reference.

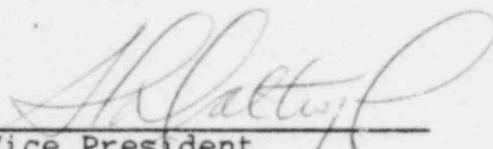
The proposed generic P8x8R MAPLHGR curve addition on page 142i is added for the purpose of reducing the need for future cycle-dependent revisions to the Technical Specifications. This curve has been constructed to bound the Reload 3 and Reload 4 P8X8R fuel.

The changes requested herein modify references in the Bases of the Technical Specifications to the General Electric reload safety evaluation document for a specific fuel cycle, and the results of that analysis for a specific fuel cycle, in order to accommodate future refuelings in accordance with the provisions of 10 CFR Section 50.59.

Since the proposed changes to the Technical Specifications do not involve a significant hazards consideration, pursuant to 10 CFR Section 170.22, Philadelphia Electric Company for fee purposes, proposes that the Application for Amendment be considered a Class III Amendment.

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,

  
Vice President

COMMONWEALTH OF PENNSYLVANIA

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SS.

COUNTY OF PHILADELPHIA

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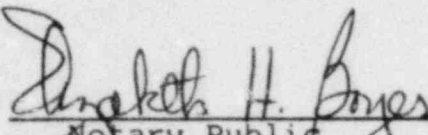
S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating License 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.



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Subscribed and sworn to  
before me this 27<sup>th</sup> day  
of March, 1981



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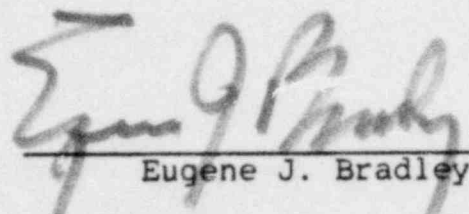
Notary Public

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 March, 1981.



Eugene J. Bradley

Attorney for  
Philadelphia Electric Company