

ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

TECHNICAL SPECIFICATION CHANGE REQUEST
Nos. 89-13 and 89-14

"NRB Members and Meeting Frequency" and "Addition of ISEG
Requirements"

Supporting Information for Changes - 14 pages

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Philadelphia Electric Company, Licensee under facility operating Licenses DPR-44 and DPR-56, for Peach Bottom Atomic Power Station Unit No. 2 and Unit No. 3, respectively, hereby requests that the Technical Specifications contained in Appendix A to the Operating Licenses be amended. Proposed changes to the Technical Specifications are indicated by the vertical bars in the margins of pages 245b, 249 and 250 contained in Attachment 2.

The proposed changes in these Technical Specification Change Requests (TSCRs) are discussed as two separate categories. Each category of changes includes a Description of Changes, a Safety Assessment and Information Supporting a Finding of No Significant Hazards Consideration. A common Environmental Impact Assessment and Conclusion are also provided. Category A changes (TSCR 89-13) involve the Nuclear Review Board (NRB) membership and meeting frequency. Category B changes (TSCR 89-14) involve adding requirements for the Independent Safety Engineering Group (ISEG). Both categories of changes are in response to the Agreement between Philadelphia Electric Company (PECo) and the Commonwealth of Pennsylvania (the Commonwealth), transmitted by letter dated June 27, 1989 from W. T. Russell (NRC) to C. A. McNeill (PECo). Category A changes address paragraph 10.3 of the Commitment Agreement and Category B changes address paragraph 4.1 of the Commitment Agreement.

Description of Changes - Category A

The following changes to the Technical Specifications are proposed:

1. Add a statement to specification 6.5.2.2 on page 249 which reads "The NRB shall be composed of at least five members who are Philadelphia Electric Company (PECo) employees and at least two outside members who are not PECO employees."
2. Delete "Each permanent member shall have a designated alternate to serve in his absence," from specification 6.5.2.3 on page 250 and add the statement "Alternates shall vote only in the absence of that member for whom they are the designated alternate."
3. Revise specification 6.5.2.5 on page 250 to read "The NRB shall meet at least once per calendar quarter."

Safety Assessment - Category A

The proposed changes do not affect the function of the NRB which is to provide independent review and audit of plant activities. Requiring non-PECo members on the NRB is intended to enhance the effectiveness of the NRB by ensuring that outside perspectives are offered and that lessons learned from other utilities are considered by PECO. The presence of the non-PECo

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members does not reduce the overall qualifications of the NRB since all NRB members (PECo and non-PECo) and NRB alternates must meet the existing qualification requirements in specifications 6.5.2.1 and 6.5.2.2.

Requiring that each member have an alternate is unnecessary and inconsistent with the Standard Technical Specifications (STS). There is no apparent safety benefit associated with this requirement. Therefore, deleting it will not have an impact on the effectiveness of the NRB. Adding the statement concerning alternates voting only in the absence of that member for whom they are the designated alternate clarifies the intent of 6.5.2.3 and ensures proper interpretation of the specification.

Increasing the meeting frequency to "at least once per calendar quarter" is more conservative than both the existing frequency of "at least once per six months" and the frequency agreed to in the Agreement with the Commonwealth which was "at least four (4) times per year". Increased meeting frequency is also proposed to enhance the effectiveness of the NRB.

Information Supporting a Finding of No Significant
Hazards Consideration - Category A

The proposed Category A changes do not constitute a significant hazards consideration in that:

- (1) The proposed Category A changes do not involve a significant increase in the probability or consequences of any accident previously evaluated.

The proposed changes to the NRB membership and meeting frequency do not alter the function of the NRB which is to provide independent review and audit of plant activities. The proposed changes apply to administrative controls which do not affect equipment performance or operator actions associated with mitigating an accident. Further, the proposed changes do not affect the initial conditions or precursors assumed in any Updated Final Safety Analysis Report (UFSAR) Section 14 accident analysis.

- (2) The proposed Category A changes do not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed changes do not directly affect the design or function of any equipment in that the proposed changes do

not involve any plant modifications or hardware changes. Since the NRB reports to and advises the Executive Vice President-Nuclear, the NRB may ultimately have an indirect impact on plant safety if the advice to the Executive Vice President-Nuclear results in plant management implementing changes in the areas of maintenance, modifications or operations. In addition, the proposed changes to the NRB do not introduce any new plant configurations, testing methods or operating scenarios.

- (3) The proposed Category A changes do not result in a significant reduction in the margin of safety.

The NRB is not addressed in any margin of safety. Further, the proposed changes to the NRB do not affect the function of the NRB. Therefore, proposed changes to NRB membership and meeting frequency will not affect any margin of safety.

Description of Changes - Category B

The following specifications are proposed to be added to the Technical Specifications to newly created page 245b:

1. Add Specification 6.2.3.1 which reads "The ISEG shall function to responsively and proactively examine unit operating characteristics, NRC issuances, industry advisories, Licensee

Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety. Such recommendations shall be submitted through the General Manager, Nuclear Quality Assurance to the Executive Vice President-Nuclear."

2. Add Specification 6.2.3.2 which reads "The Peach Bottom ISEG shall be composed of at least five dedicated, full-time engineers, including the ISEG Superintendent, located onsite. The Peach Bottom ISEG shall meet all of the following qualification requirements:
 - a. Each member shall have a bachelor's degree in engineering or related science.
 - b. The ISEG Superintendent shall have at least six years of full-time commercial nuclear experience.
 - c. Each of the members shall have at least two years of full-time commercial nuclear experience.
 - d. Not more than one of the members shall have less than three years of full-time commercial nuclear experience.

- e. Excluding the experience of the Superintendent, the members collectively shall have at least 16 years of full-time commercial nuclear experience.
 - f. The ISEG (Superintendent included) collectively shall have the broad range of knowledge and experience necessary to perform the functions and responsibilities specified in 6.2.3.1 and 6.2.3.3."
3. Add Specification 6.2.3.3 which reads "The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical." The asterisk refers to a note at the bottom of page 245b which reads "Not responsible for sign-off function".
4. Add Specification 6.2.3.4 which reads "The ISEG reports to the General Manager, Nuclear Quality Assurance. If any significant nuclear quality concern identified by the ISEG is not adequately resolved, the General Manager, Nuclear Quality Assurance shall notify the Nuclear Review Board, the Executive Vice President-Nuclear or the Nuclear Committee of the Board. If the ISEG is not satisfied with the resolution of any significant nuclear quality concern by the General Manager, Nuclear Quality Assurance, the ISEG shall notify the Nuclear Review Board of that concern."

5. Add Specification 6.2.3.5 which reads "Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the General Manager, Nuclear Quality Assurance."

Safety Assessment - Category B

The Agreement with the Commonwealth refers to the position of ISEG Supervisor. Subsequent to the Agreement, the position of ISEG Supervisor was elevated to ISEG Superintendent. This change is reflected in this TSCR. Elevating the ISEG supervisory position does not adversely affect the Agreement. The position of Superintendent recognizes the importance of the ISEG and ensures that the individual has the authority necessary to perform his function, which meets the intent of the Agreement.

Inclusion of the ISEG in the Technical Specifications is discussed as Action Item I.B.1.2 in NUREG 0737 "Clarification of TMI Action Plan Requirements" for applicants of operating licenses. The ISEG is also addressed in Section 13.4 of NUREG 0800 "Standard Review Plan" (SRP). Although this NUREG 0737 item was not a requirement for Peach Bottom and Peach Bottom is not committed to the SRP, the proposed requirements for the PBAPS ISEG generally meet or exceed the guidance discussed in both NRC documents.

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The principal function of the ISEG is to responsively and proactively examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources of unit design and operating experience information that may indicate areas for improving plant safety. Based on these examinations, the ISEG makes detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving unit safety. The ISEG is also responsible for maintaining surveillance of unit activities to provide independent verification that these activities are performed correctly and that human errors are reduced as much as practical. As a result of the foregoing activities, the ISEG is in a position to advise utility management on the overall quality and safety of operations. ISEG is not responsible for sign-off functions associated with plant operations, maintenance or modifications.

In accordance with the NRC guidance, the PBAPS ISEG will consist of a minimum of five dedicated full-time members including one Superintendent, and each member must have a bachelor's degree in engineering or related science. The NRC requirements for ISEG members is two years experience in their field, including one year of nuclear experience. In accordance with the agreement with the Commonwealth, the qualification requirements for PBAPS ISEG members exceed the NRC guidance in that the following requirements apply: 1) the ISEG Superintendent shall have at least six years of full-time

commercial nuclear experience, 2) each member shall have at least two years of full-time commercial nuclear experience, 3) not more than one of the members shall have less than three years of full-time commercial nuclear experience, 4) excluding the experience of the Superintendent, the members shall collectively have at least 16 years of full-time commercial nuclear experience, and 5) the PBAPS ISEG (Superintendent included) shall collectively have the broad range of knowledge and experience necessary to perform the functions and responsibilities required by proposed TS 6.2.3.1 and 6.2.3.3.

The location and reporting relationship of the ISEG ensure effective implementation of the ISEG. The Peach Bottom ISEG is physically located onsite, but reports to the offsite General Manager, Nuclear Quality Assurance (NQA). The onsite location allows daily contact with the operating personnel and continued access to plant facilities and records. Recommendations from ISEG are submitted through the General Manager, NQA to the Executive Vice President-Nuclear. Neither the ISEG nor the management to whom it reports is part of the plant operating chain of command. Thus, the ISEG functions effectively while maintaining its independence of the line organization responsible for the conduct of plant activities.

Implementation of the ISEG does not alter the function or decrease the effectiveness of the Plant Operations Review Committee

(PORC), the Nuclear Review Board (NRB) or the Quality Assurance Organization as required by 10 CFR Appendix B, Criterion I.

Information Supporting a Finding of No Significant Hazards
Consideration - Category B

The Category B changes do not constitute a significant hazards consideration in that:

- (1) The proposed Category B changes do not involve a significant increase in the probability or consequences of any accident previously evaluated.

The proposed administrative controls do not involve an increase in the probability or consequences of any accident previously evaluated. The functions of the ISEG are stated in proposed specification 6.2.3.1. The purpose of assigning these responsibilities is to decrease the probability of occurrence of an accident by increasing the reliability of equipment and reducing the human errors associated with unit activities as much as practical. The presence of the ISEG will not adversely affect the consequences of an accident. The ISEG and its management are not part of the plant operating chain of command, and

therefore cannot directly affect any operator actions to mitigate an accident.

- (2) The proposed Category B changes do not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed administrative controls for the ISEG do not directly alter the function or decrease the effectiveness of any group responsible for review or oversight (i.e., PORC, NRB or Quality Assurance Organization required by 10 CFR 50, Appendix B, Criterion I) or the design or function of any equipment. In addition, these proposed administrative controls do not introduce any new plant configurations, testing methods or operating scenarios.

- (3) The proposed Category B changes do not result in a significant reduction in the margin of safety.

The proposed administrative controls will provide for independent assessment of unit activities. The ISEG will review various sources of operating experience information which may indicate areas for improving unit safety. The ISEG is not addressed in any margin of safety. As stated in proposed specification 6.2.3.1, the ISEG shall function to improve unit safety.

Environmental Impact Assessment

An environmental impact assessment is not required for these proposed changes because the changes conform to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22(c)(9). The proposed changes do not involve any systems that have a direct relationship with the environment. These proposed changes involve revising requirements for the NRB membership and meeting frequency and adding requirements for the ISEG. These proposed changes involve no significant hazards consideration as demonstrated in the preceding section. These proposed changes involve no significant change in the types or significant increase in the amounts of any effluents that may be released offsite and there will be no significant increase in individual or cumulative occupational radiation exposure.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the Technical Specifications and have concluded that they do not involve unreviewed safety questions and will not endanger the health and safety of the public.