

10 CFR 50.90



PECO ENERGY

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

March 28, 1994

Docket Nos. 50-277
50-278
License Nos. DPR-44
DPR-56

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Facility Operating License Change Request

Dear Sir:

PECO Energy Company hereby submits License Change Request (LCR) 90-05, in accordance with 10 CFR 50.90, requesting changes to the Peach Bottom Atomic Power Station (PBAPS) Facility Operating Licenses (FOL).

The proposed changes concern the relocation of the Technical Specifications Fire Protection requirements to the Updated Final Safety Analysis Report in accordance with NRC Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," and GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications."

Attachment 1 to this letter describes the proposed changes and Attachment 2 contains the revised pages.

If you have any questions concerning this submittal, please contact us.

Sincerely,

G. A. Hunger, Jr., Director
Licensing Section

Enclosures: Affidavit, Attachments

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cc: T. T. Martin, Administrator, Region I, USNRC
W. L. Schmidt, Senior Resident Inspector, PBAPS, USNRC
W. P. Dornsife, Commonwealth of Pennsylvania

COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF CHESTER :

D. M. Smith, being first duly sworn, deposes and says:

That he is Senior Vice President and Chief Nuclear Officer of PECO Energy Company; the applicant herein; that he has read the attached License Change Request (LCR 90-05) for changes to the Peach Bottom Facility Operating Licenses DPR-44 and DPR-56, 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.



Senior Vice President and
Chief Nuclear Officer

Subscribed and sworn to
before me this 28th day
of March 1994.



Notary Public

Notarial Seal
Erica A. Santori, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires July 10, 1995

ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

Facility Operating License Change Request
90-05

"Relocation of Technical Specifications
Fire Protection Requirements
to the
Updated Final Safety Analysis Report"

Supporting Information for Changes

PECO Energy Company, Licensee under Facility Operating Licenses (FOL) DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3 respectively, requests that the Facility Operating License and Technical Specifications (TS) be amended for both units. Proposed changes to the FOL and TS are indicated by vertical bars in the margins of the Unit 2 and Unit 3 pages and listed here: 6 (FOL), 240c thru 240s, 244, 246, 248, 252, 253. The proposed revised pages are contained in Attachment 2 of this application.

Please note that the pages contained in Attachment 2 contain only the changes proposed by this request. Other changes to TS page 244 were submitted by letter dated October 27, 1993. Additionally, other changes to TS page 246 were submitted by letters dated October 27, 1993 and November 19, 1993. These other changes to pages 244 and 246 are pending NRC approval.

The proposed changes concern the relocation of the TS Fire Protection requirements to the Updated Final Safety Analysis Report (UFSAR) in accordance with NRC Generic Letters (GL) 86-10, "Implementation of Fire Protection Requirements," and GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications."

Licensee proposes that the changes be effective upon completion of the UFSAR revision which will incorporate the relocated Fire Protection requirements. Licensee proposes to notify the NRC when the UFSAR revision is complete.

Description of Changes

Licensee proposes the following changes:

- 1) Page 6 (FOL), (Section 2.C(5) for Unit 2)
(Section 2.C(4) for Unit 3)

Replace the existing Fire Protection license condition with the following:

"PECO Energy Company shall implement and maintain in effect all provisions of the approved fire protection program as described in the Updated Final Safety Analysis Report for the facility, and as approved in the NRC Safety Evaluation Report dated September 16, 1993, subject to the following provision:

PECO Energy Company may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire."

- 2) Delete existing page 240c and insert new page 240c which states:

"The Fire Protection Limiting Conditions for Operation and Surveillance Requirements have been relocated to the Fire Protection Program, which is part of the UFSAR. These requirements are still mandated by the Facility Operating License."

- 3) Delete pages 240d through 240s in their entirety and replace them with a single page which states:

"LEFT BLANK INTENTIONALLY"

- 4) Page 244, Section 6.2.2, "Facility Staff"

Delete Section 6.2.2(f) which states:

"A Fire Brigade of at least 5 members shall be maintained onsite at all times. The Fire Brigade shall not include the minimum shift crew necessary for safe shutdown of the unit(s) (3 members) or any personnel required for other essential functions during a fire emergency."

- 5) Page 246, Section 6.4, "Training"

Delete Section 6.4.2 which states:

"A training program for the Fire Brigade shall be conducted such that Fire Brigade members complete an instruction program within a two year period. Regularly planned meetings will be held every 3 months."

- 6) Page 248, Section 6.5.1.6, "Responsibilities"

Insert proposed Section 6.5.1.6(l) which states:

"Review of the facility Fire Protection Program, and shall submit recommended changes to the Program to the Plant Manager and the Nuclear Review Board."

- 7) Page 252, Section 6.5.2.8, "Audit"

Insert proposed Section 6.5.2.8(j) which states:

"The facility Fire Protection Program and implementing procedures at least once per two years."

- 8) Page 253, Section 6.8, "Procedures"

Insert proposed Section 6.8.1(d) which states:

"Procedures for the implementation of the Fire Protection Program."

Safety Discussion

The foregoing changes are being proposed to 1) institute the standard fire protection license condition, 2) relocate the fire protection systems and fire brigade staffing from TS, and 3) add administrative controls to support the Fire Protection Program (FPP) using the guidance provided in NRC GL's 86-10 and 88-12.

Change request 1) proposes to replace the existing FOL fire protection license condition with the standard fire protection license condition in GL 86-10. The standard fire protection license condition precludes changes to the approved FPP without prior NRC approval if those changes would adversely affect the ability to achieve and maintain safe shutdown conditions in the event of a fire.

Change request 2) proposes to insert a revised page 240c which will alert the user of the TS that the Fire Protection requirements have been relocated to the FPP, and that the requirement to maintain the FPP is contained in the FOL. This change is proposed to provide continuity and to avoid confusion when referring to the TS.

Change request 3) proposes to delete TS pages 240d through 240s in their entirety. These pages comprise TS sections 3.14, "Fire Protection Limiting Conditions for Operation (LCOs)" and 4.14, "Surveillance Requirements (SRs)" along with their associated Bases. These pages will be relocated to the FPP which is an appendix to the UFSAR.

Change requests 4) through 8) propose to augment the Administrative Controls section of the TS to support the relocation of TS Fire Protection requirements to the FPP.

Change request 4) proposes to delete the TS requirement to maintain a Fire Brigade as part of the Facility Staff. This requirement will be relocated to the FPP which is an appendix to the UFSAR.

Change request 5) proposes to delete the TS requirement to maintain a training program for the Fire Brigade. This requirement will be relocated to the FPP which is an appendix to the UFSAR.

Change request 6) proposes to insert a new requirement 6.5.1.6(l) to require the Plant Operations Review Committee (PORC) to review the FPP and submit recommended changes to the program to the PBAPS Plant Manager and the Nuclear Review Board. This new requirement is consistent with PORC's responsibility to review the Emergency and Security Plans.

Change request 7) proposes to insert a new requirement 6.5.2.8(j) to require the Nuclear Review Board (NRB) to be cognizant of audits being performed on the FPP and implementing procedures at least once per two years. This new requirement is consistent with NRB's responsibility for auditing the Emergency and Security Plans.

Change request 8) proposes to insert a new requirement 6.8.1(d) to require written

procedures be established, implemented and maintained for the implementation of the FPP.

Proposed changes 1 through 8 are consistent with the guidance provided in NRC GL's 86-10 and 88-12 and are considered administrative in nature. Therefore, they will have no impact on safety.

No Significant Hazards Consideration

Licensee proposes that this application does not involve significant hazards considerations for the following reasons:

- i) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes are administrative in nature and are consistent with the guidance provided in NRC GL's 86-10 and 88-12. They do not affect the initial conditions or precursors assumed in the Updated Final Safety Analysis Report Section 14. These changes do not decrease the effectiveness of equipment relied upon to mitigate the previously evaluated accidents.

Therefore, there is no increase in the probability or consequences of an accident previously evaluated.

- ii) The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed changes do not make any physical changes to the plant or changes to operating procedures. Therefore, implementation of the proposed changes will not affect the design function or configuration of any component or introduce any new operating scenarios or failure modes or accident initiation.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

- iii) The proposed change does not involve a significant reduction in a margin of safety.

The proposed changes are administrative in nature and are consistent with the guidance provided in NRC GL's 86-10 and 88-12. The proposed changes do not adversely affect the assumptions or sequence of events used in any accident analysis.

Therefore, the proposed changes do not involve a reduction in any margin of safety.

Environmental Impact Assessment

An environmental impact assessment is not required for the changes proposed by this Application 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 or equipment that have a direct relationship with the environment. The proposed administrative changes involve replacing the existing fire protection license condition with a new standard condition and the relocation of TS Fire Protection requirements to the FPP as discussed in the previous section.

The changes involve no significant change in the types or significant increase in the amounts of any effluent 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 the proposed changes and have concluded that they do not involve an unreviewed safety question and that they are not a threat to the health and safety of the public.