



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NOS. 187 AND 192 TO FACILITY OPERATING

LICENSE NOS. DPR-44 and DPR-56

PHILADELPHIA ELECTRIC COMPANY  
PUBLIC SERVICE ELECTRIC AND GAS COMPANY  
DELMARVA POWER AND LIGHT COMPANY  
ATLANTIC CITY ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3

DOCKET NOS. 50-277 AND 50-278

1.0 INTRODUCTION

By letter dated November 17, 1993, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Peach Bottom Atomic Power Station (PBAPS), Unit Nos. 2 and 3, Technical Specifications (TS). The requested changes would revise the surveillance requirements (SR) to eliminate unnecessary diesel generator testing when a diesel generator or an offsite power source becomes inoperable.

2.0 EVALUATION

The proposed changes to SR for TS Section 4.9.B, "Operation with Inoperable Equipment," are:

1. Delete the requirement in TS Section 4.9.B.1 to demonstrate operability of the diesel generators when an offsite power source is determined to be inoperable.
2. Revise the requirement in TS Section 4.9.B.3 and Section 4.9.B.4 to require that station personnel either determine that the remaining operable diesel generators are not also inoperable due to a common cause failure or perform SR 4.9.A.1.2.A.3 when one diesel generator is determined to be inoperable.

The current TS SR 4.9.B.1 requires that the operable emergency diesel generators (EDGs) be started to demonstrate operability when one offsite power source becomes inoperable. The intent of this additional testing is to provide added assurance that the EDGs are capable of supplying emergency power when one of the offsite power sources becomes inoperable. The current SR 4.9.B.3 requires that the operable EDGs be started to demonstrate operability when one EDG becomes inoperable due to any reason other than preplanned preventive maintenance, or testing. The current SR 4.9.B.4 requires that the

operable EDGs be started to demonstrate operability when one EDG and one offsite power source become inoperable. The additional testing in these two SR sections is to determine if a common cause failure exists.

Generic Letter (GL) 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability," issued in July 1984, contains the staff's recommendation to reduce the number of diesel generator "fast starts." The staff determined that these "fast starts" resulted in premature diesel engine degradation. Other diesel generator start tests were also targeted for reduction on the basis that excessive testing results in degradation of diesel engines. The requirement for the EDG surveillance testing in the current TS SR 4.9.B.1 can result in unnecessary testing of otherwise operable EDGs when an offsite power source is declared inoperable. The staff agrees that the loss of one of the offsite power sources does not imply any loss of EDG reliability or common cause failure.

The staff considers that the normal TS surveillance testing is sufficient to demonstrate reliability and assurance that the EDGs are capable of performing their intended function. Therefore, the additional testing included in the current TS SR Section 4.9.B.1 is considered excessive. Additionally, allowing station personnel to verify that the cause of one EDG being inoperable (SR Sections 4.9.B.3 and 4.9.B.4) does not affect the operability of the remaining operable EDGs will further reduce unnecessary testing of the operable EDGs. Also, the proposed change is consistent with the staff's improved standard TS ("Standard Technical Specifications, General Electric Plants, BWR/4," NUREG-1433, September 1992). Therefore, the staff finds the licensee's proposal, which eliminates unnecessary diesel generator testing when a diesel generator or an offsite power source becomes inoperable, acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments change surveillance requirements. The MRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (59 FR 628). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

## 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Date: April 5, 1994