

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

November 30, 1990

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

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

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Technical Specifications Change Request

Gentlemen:

Philadelphia Electric Company hereby submits Technical Specifications Change Request No. 90-12, in accordance with 10 CFR 50.90, requesting an amendment to the Technical Specifications (Appendix A) of Operating License Nos. DPR-44 and DPR-56. Information supporting this Change Request is contained in Attachment 1 to this letter, and the proposed replacement pages are contained in Attachment 2.

This submittal requests a change to increase the Emergency Diesel Generator periodic inspection interval from annual to once per 18 months.

If you have any questions regarding this matter, please contact us. The Licensing Engineer for this Change Request is Paul Blackiston (215-640-6787).

Very truly yours,

G. A. Hunger, Jr.

G. A. Hunger, Jr.
Manager-Licensing
Nuclear Engineering & Services

9012100162 901130
PDR ADDCK 05000277
P PDC

Attachments 1 and 2

cc: T. T. Martin, Administrator, Region I, USNRC
J. J. Lyash, USNRC Senior Resident Inspector
T. M. Gerusky, Director, PA Bureau of Radiological Protection

Abol
11/1

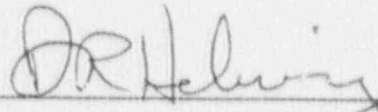
COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF CHESTER :

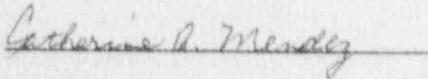
D. R. Helwig, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company; the Applicant herein; that he has read the Technical Specifications Change Request No. 90-12, 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.

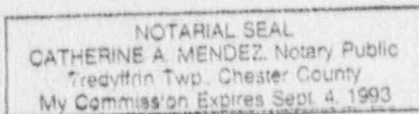


Vice President

Subscribed and sworn to
before me this 29th day
of November 1990.



Notary Public



ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

TECHNICAL SPECIFICATIONS CHANGE REQUEST
No. 90-12

"Diesel Generator Periodic Inspection Interval"

Supporting Information for Changes - 5 pages

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

Philadelphia Electric Company, Licensee under Facility Operating Licenses DPR-44 and DPR-56, hereby requests that the Technical Specifications contained in Appendix A to the Operating License be amended as indicated by a bar in the margin of pages 218b and 218c.

The proposed Technical Specification change is to increase the periodic inspection interval for the emergency diesel generators from annual to once per 18 months. The purpose of this change is to provide greater flexibility for completing the tear-down inspection of the diesel generators during planned station outages, reduce the probability of a two unit shutdown if the allowed out-of-service time could not be satisfied, and establish consistency with the Standard Technical Specifications (STS) for General Electric Boiling Water Reactors, NUREG-0123. The change request is based upon the diesel generator manufacturer's recommendations, plant experience, general industry practice, and the STS.

The proposed eighteen month time interval between tear-down inspections is within the manufacturer's (Fairbanks-Morse) recommended interval as documented in Section W of the updated vendor manual. Additionally, plant records demonstrate an approximate 2% unavailability rate for each diesel due to the current annual maintenance inspection outage, and in some cases this inspection outage was the only contributor to the yearly

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

unavailability of the particular diesel generator. Performing this inspection once per 18 months will further reduce the unavailability of the four diesel generators.

A comprehensive diesel generator parameter trending program is in place at PBAPS which is utilized to predict problems concerning the diesel generators. During surveillance testing of the diesel generators, important diesel generator operating parameters are logged and plotted on charts in an effort to predict potential problems related to the operation of the diesel generators. This program has been proved successful at Peach Bottom in detecting and correcting abnormalities related to the operation of the diesel generators.

A once per refueling cycle inspection frequency has been approved for the Limerick Generating Station which also utilizes diesel generators manufactured by Fairbanks-Morse.

Information Supporting a No Significant Hazards Consideration
Determination

Licensee proposes that the requested changes do not involve significant hazards considerations for the following reasons:

- i) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed Technical Specification to extend the inspection frequency from an annual inspection frequency to a once per 18 months frequency is consistent with the vendor's recommendations and will not impact the operability of the diesel generator. The proposed change does not affect the Loss of Coolant Accident (LOCA) coupled with Loss of Offsite Power (LOOP) accident analysis as presented in Chapter 14 of the PBAPS Updated Final Safety Analysis Report (UFSAR). The current annual tear down inspection contributes significantly to the unavailability of the diesel generator. A once per 18 months tear-down inspection will lower the unavailability of the diesel generators due to the inspection and thus increase their availability to mitigate the consequence of a potential accident. Additionally, the extent of accelerated testing of other safety equipment which results from a diesel generator being out-of-service, will be reduced. The proposed change does not impact the operation or design of the onsite emergency power system and, therefore, will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

- ii) The proposed revisions do not create the possibility of a new or different kind of accident from any previously evaluated because the operation and design of the onsite emergency power system is not being changed, only the inspection schedule. The proposed change in inspection frequency is consistent with the diesel generator manufacturer's recommendations and the effect of a diesel generator being out-of-service during a design basis accident is evaluated in the LOCA/LOOP accident analysis. The proposed change will, therefore, not create the possibility of a new or different kind of accident from any previously evaluated.
- iii) The proposed revisions do not involve a significant reduction in a margin of safety because the design and operation of the onsite emergency power system is not changed. The proposed change to a once per 18 month inspection frequency will increase the availability of the diesel generators to mitigate the consequences of an accident and, therefore, does not involve a significant reduction in a margin of safety.

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

Information Supporting an 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 Application involves no significant hazards consideration as demonstrated in the preceding section. The Application involves no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and there is no significant increase in individual or cumulative occupational radiation exposure.

Conclusion

The proposed changes were analyzed to determine the effect upon the accident analyses contained in Section 14 of the PBAPS UFSAR. In addition, a determination of No Significant Hazards Consideration was completed.

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 a Significant Hazards Consideration, and will not endanger the health and safety of the public.

ATTACHMENT 2

PEACH BOTTOM ATOMIC POWER STATION

UNITS 2 AND 3

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

TECHNICAL SPECIFICATION CHANGES

List of Attached Pages

218b, 218c