

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

April 15, 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
Technical Specifications Change Request 93-28

Dear Sir:

PECO Energy Company hereby submits Technical Specifications Change Request (TSCR) No. 93-28, in accordance with 10CFR50.90 requesting a change to the Facility Operating Licenses and Technical Specifications (TS) for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The proposed TS Changes correct a typographical error in Unit 3 TS, reflect the name change of Philadelphia Electric Company to PECO Energy Company, and implement line-item TS improvements recommended by Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation."

The line-item TS improvements propose changes to Surveillance Requirements consistent with the intent of the corresponding recommendations in Generic Letter 93-05 and are compatible with PBAPS operating experience. These proposed changes are also consistent with the corresponding requirements in NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4," the corresponding recommendations in NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements," and the format of the PBAPS TS.

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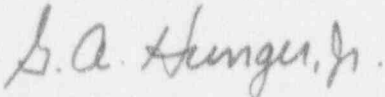
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April 15, 1994

Page 2

Attachment 1 to this letter describes the proposed changes and provides justification for the changes. Attachment 2 provides the revised Technical Specifications pages. If you have any questions regarding this matter, please contact us.

Very truly yours,



G. A. Hunger, Jr., Director
Licensing

JLP/eas

Enclosures: Affidavit, Attachment 1, Attachment 2

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

COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF CHESTER :

W. H. Smith, III, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company; the Applicant herein; that he has read the attached Attachment 1 and Attachment 2 of the Technical Specifications Change Request (Number 93-28) for 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.

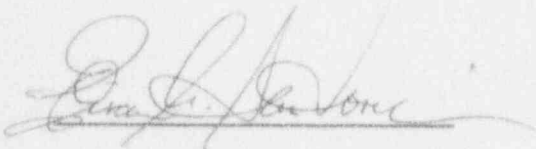


Vice President

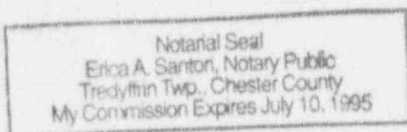
Subscribed and sworn to

before me this 15th day

of April 1994.



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 SPECIFICATION CHANGE REQUEST
93-28

"Name Change and Reduction in Surveillance
Requirements during Power Operation"

Supporting Information for Changes 4 Pages

PECO Energy Company requests that the Facility Operating Licenses and Technical Specifications (TS) for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3 be amended as proposed below to correct a typographical error in Unit 3 TS, reflect the name change of Philadelphia Electric Company to PECO Energy Company, and implement line-item TS improvements recommended by Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation." By reducing the amount of testing that the TS require during power operation, safety can be improved, equipment degradation can be decreased, and an unnecessary burden on personnel resources can be eliminated. The proposed changes to Surveillance Requirements for TS Sections 4.3.A.2.a, 4.4.A.2, and 4.4.B.3 are compatible with PBAPS operating experience and is consistent with the intent of the corresponding recommendations in NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements," guidance in Generic Letter 93-05, and the format of the PBAPS TS.

This TS Change Request for PBAPS, Units 2 and 3, provides a discussion and description of the proposed changes, a safety assessment, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

The proposed revised pages are provided in Attachment 2. Proposed changes are indicated by vertical bars in the margin of the pages.

We request that, if approved, the changes be effective upon issuance.

Discussion and Description of the Proposed Changes

1. Revise Unit 3 TS Section 3.3.A.2.f to correct a typographical error to provide clarity concerning control rod operability by requiring that no more than one control rod in any 5x5 array may be inoperable (i.e., changed operable to inoperable).
2. Revise License Nos. DPR-44 and DPR-56, TS Section 6.5.2.2 and 6.9.1.e(2)c, TS Figure 3.8.1 and Environmental TS Section 6.0 to change the name of the owner and licensee of PBAPS Units 2 and 3 to PECO Energy Company.
3. Revise the frequency in TS Section 4.3.A.2.a to exercise each partially or fully withdrawn operable control rod from every 24 hours to within 24 hours when operating above the RWM low power setpoint if there are three or more inoperable control rods or if there is one fully or partially withdrawn rod which cannot be moved and for which control rod drive mechanism damage has not been ruled out. This corresponds to Generic Letter 93-05 Item 4.2, "Control Rod Movement Test."

4. Revise TS Section 4.4.A.2 to allow for the replacement charge on the explosive valve for the standby liquid control system to be from either the same manufactured batch as the one fired or another batch which has been certified by having one of the batch successfully fired. This corresponds to Generic Letter 93-05 Item 4.3, "Standby Liquid Control System (BWR)."
5. Revise the frequency in TS Section 4.4.B.3 to functionally test each standby liquid control system pump loop from monthly to at least once per 92 days. This corresponds to Generic Letter 93-05 Item 4.3, "Standby Liquid Control System (BWR)."

Safety Assessment

Proposed changes 1 and 2 are administrative in nature. Proposed changes 3, 4, and 5 implement line-item TS improvements recommended by Generic Letter 93-05 to reduce Surveillance Requirements for testing during power operation. Reducing the amount of testing during power operation improves safety, decreases equipment degradation, and eliminates an unnecessary burden on personnel resources.

Information Support a Finding of No Significant Hazards Consideration

The changes proposed in the Application do not constitute a Significant Hazards Consideration in that:

- i) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed changes do not alter the operation of equipment assumed to be an initiator of any analyzed event or assumed to be available for the mitigation of accidents or transients. Proposed changes 1 and 2 are administrative in nature. Proposed change 3 to reduce the requirement to verify insertion capability from every 24 hours to a single verification when one or more control rods are stuck is sufficient to verify that the problem is not generic while providing the benefit of removing a very resource intensive requirement and permits licensed operators to focus on other, more safety significant actions. Proposed change 4 will continue to provide the necessary assurance that replacement charges on the explosive valve of the standby liquid control system will be from a batch from which a sample charge has been tested satisfactorily. Proposed change 5 modifies the allowable interval between surveillance tests for the standby liquid control system without reducing the reliability of the system while providing the benefit of reduced wear and tear on the system. Therefore, these proposed changes do not increase the probability or consequences of an accident previously evaluated.

- ii) The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because implementation of the proposed changes do not involve any physical changes to plant systems, structures, or components. The proposed changes do not allow plant operation in any mode that is not already evaluated. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated is not created.
- iii) The proposed changes do not involve a significant reduction in a margin of safety because the proposed changes do not affect the manner in which the facility is operated or change equipment or features which affect the operational characteristics of the facility. Proposed changes 1 and 2 are administrative in nature. Proposed change 3 maintains the assurance that when a scram is required that, at a minimum, the assumptions used in the accident analysis will be met. Additionally, if the initial check of control rod insertion is satisfactory, the subsequent checks are not likely to identify similar problems because operating experience shows that a struck rod is rare. Once it has been determined that the same problem is not occurring in other control rods the normal surveillance frequency is sufficient to verify that scram capability is maintained. Proposed change 4 provides added flexibility for providing replacement changes from any batch that has had a charge successfully fired. Proposed change 4 adds flexibility while maintaining the firing reliability in excess of 99.99% for the explosive valves on the standby liquid control system. Proposed change 5 does not impact any safety analysis assumptions because the frequency of testing is not assumed in any safety analysis and standby liquid control system operability is maintained. In addition, the test frequency reduction provides reduced wear and tear on the system and increased system reliability. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Information Supporting an Environmental 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 10CFR51.22(c)(9). The proposed changes will have no impact on the environment. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the proposed changes do not involve a significant increase in individual or cumulative occupation radiation exposure.

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Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed the proposed changes and have concluded that the changes do not involve an unreviewed safety question and will not endanger the public health and safety.

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 CHANGE REQUEST
93-28

List of Attached Pages

Unit 2

Unit 3

License No. DPR-44

License No. DPR-56

APPENDIX A PAGES

APPENDIX A PAGES

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APPENDIX B PAGE 14

APPENDIX B PAGE 14

UNITED STATES
ATOMIC ENERGY COMMISSION
Washington, DC 20545

PECO ENERGY COMPANY
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY
DOCKET NO. 50-277
PEACH BOTTOM ATOMIC POWER STATION, UNIT 2
FACILITY OPERATING LICENSE

License No. DPR-44
Amendment No. 1

1. The Atomic Energy Commission (the Commission) having found that:
 - A. The application for license filed by PECO Energy Company, formerly Philadelphia Electric Company, Public Service Electric and Gas Company, Delmarva Power and Light Company, and Atlantic City Electric Company (the licensees) complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I and all required notifications to other agencies or bodies have been duly made;
 - B. Construction of the Peach Bottom Atomic Power Station, Unit 2 (the facility) has been substantially completed in conformity with Construction Permit No. CPPR-37 and the application, as amended, the provisions of the Act and the rules and regulations of the Commission;
 - C. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - D. There is reasonable assurance: (1) that the activities authorized by this amended operating license can be conducted without endangering the health and safety of the public, and (2) that such activities will be conducted in compliance with the rules and regulations of the Commission;
 - E. PECO Energy Company is technically qualified and the licensees are financially qualified to engage in the activities authorized by this amended operating license in accordance with the rules and regulations of the Commission;
 - F. The licensees have satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;
 - G. The issuance of this operating license will not be inimical to the common defense and security or to the health and safety of the public;
 - H. After weighing the environmental, economic, technical, and other benefits of the facility against environmental costs and considering available alternatives, the issuance of Amendment No. 1 to Facility Operating License No. DPR-44 is in accordance with 10 CFR Part 50, Appendix D, of the Commission's regulations and all applicable requirements of said Appendix D

have been satisfied; and

- I. The receipt, possession, and use of by-product and special nuclear material as authorized by this license will be in accordance with the Commission's regulations in 10 CFR Parts 30 and 70, including 10 CFR Section 30.33, and 70.23 and 70.31.
2. Amendment No. 1 to Facility Operating License No. DPR-44 issued to the PECO Energy Company, formerly the Philadelphia Electric Company, Public Service Electric and Gas Company (PSE&G), Delmarva Power and Light Company (DP&LC), and Atlantic City Electric Company (ACEC), is hereby amended in its entirety to read as follows:
 - A. This amended license applies to the Peach Bottom Atomic Power Station, Unit 2, a single cycle, forced circulation, boiling water nuclear reactor and associated equipment (the facility), owned by the licensees and operated by PECO Energy Company. The facility is located in Peach Bottom, York County, Pennsylvania and is described in the "Final Safety Analysis Report" as supplemented and amended (Amendments 1 through 29) and the Environmental Report as supplemented and amended (Supplements 1 through 6).
 - B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses:
 - (1) PECO Energy Company, pursuant to Section 104b of the Act and 10 CFR Part 50, "Licensing of Production and Utilization Facilities," to possess, use, and operate the facility and PSE&G, DP&LC, and ACEC to possess the facility at the designated location in Peach Bottom, York County, Pennsylvania in accordance with the procedures and limitations set forth in this license;
 - (2) PECO Energy Company, pursuant to the Act and 10 CFR Part 70, to receive, possess and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended, as of December 15, 1975;
 - (3) PECO Energy Company, pursuant to the Act and 10 CFR Parts 30, 40, and 70 to receive, possess and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
 - (4) PECO Energy Company, pursuant to the Act and 10 CFR Parts 30, 40 and 70 to receive, possess and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form for sample analysis or instrument calibration or when associated with radioactive apparatus or components;
 - (5) PECO Energy Company, pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not to separate, such byproduct and special nuclear material as may be produced by operation of the facility.

C. This amended license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified below:

(1) Maximum Power Level

PECO Energy Company is authorized to operate the Peach Bottom Atomic Power Station, Unit 2, at steady state reactor core power levels not to exceed 3293 megawatts thermal.

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. are hereby incorporated in the license. PECO Energy Company shall operate the facility in accordance with the Technical Specifications.

(3) The licensee may perform modifications to the Low Pressure Coolant Injection System as described in the licensee's application for license amendment dated July 9, 1975. The licensee shall not operate the facility prior to receipt of the Commission's authorization.

(4) Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Peach Bottom Atomic Power Station, Units 2 and 3, Physical Security Plan," with revisions submitted through December 16, 1987; "Peach Bottom Atomic Power Station, Units 2 and 3 Plant Security Personnel Training and Qualification Plan," with revisions submitted through July 9, 1986; and "Peach Bottom Atomic Power Station, Units 2 and 3 Safeguards Contingency Plan," with revisions submitted through March 10, 1981. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

(5) The licensee may proceed with and is required to complete the modifications identified in Paragraphs 3.1.1 through 3.1.16 of the NRC's Fire Protection Safety Evaluation (SE), dated May 23, 1979 for the facility. These modifications will be completed in accordance with the schedule in Table 3.1 of the SE and supplements thereto. In addition, the licensee shall submit the additional information identified in Table 3.2 of this SE in accordance with the schedule contained therein.

3. This amended license is subject to the following conditions for the protection of the environment:
- A. Upon completion of the licensees' "smoke tests," the licensees shall release all procedures, data, and analysis bearing on the calculation of X/Q to the Regulatory Staff as soon as possible but no later than initial fuel loading for Peach Bottom Unit 3. Using the "smoke test" results to re-calculate X/Q and using the other assumptions previously used by the Regulatory Staff (or realistic refinements thereof), the Regulatory Staff shall re-calculate the potential radioiodine thyroid dose to a child via the milk pathway at the points of maximum concentration at or beyond the site boundary where dairy cows are present or could be pastured. If this calculated dose based on the combined operation of Peach Bottom Units 2 and 3 exceeds 15 mrem/year, then the licensees shall install for operation no later than the next refueling cycle for each unit the necessary equipment to reduce the projected dose to such levels.
 - B. If the actual milk sample measurements taken at the nearby farms in accordance with the Technical Specifications, predict a dose to a child's thyroid, based on actual combined operation of Unit 2 and 3, that exceeds 15 mrem/year, licensees shall install for operation no later than the next refueling cycle for each unit the necessary equipment to reduce the projected dose to such levels.
 - C. To the extent matters related to thermal discharges are treated therein, operation of Peach Bottom Atomic Power Station Unit No. 2 will be governed by NPDES Permit No. PA 0009733, as now in effect and as hereafter amended. Questions pertaining to conformance thereto shall be referred to and shall be determined by the NPDES Permit issuing or enforcement authority, as appropriate.
 - D. In the event of any modification of the NPDES Permit related to thermal discharges or the establishment (or amendment) of alternative effluent limitations established pursuant to Section 316 of the Federal Water Pollution Control Act, the licensees shall inform the NRC and analyze any associated changes in or to the Station, its components, its operation or in the discharge of effluents therefrom. If such change would entail any modification to this license, or any Technical Specifications which are part of this license, or present an unreviewed safety question or involve an environmental impact different than analyzed in the Final Environmental Statement, the licensees shall file with the NRC, as applicable, an appropriate analysis of any such change on facility safety, and/or an analysis of any such change on the environmental impacts and on the overall cost-benefit balance for facility operation set forth in the Final Environmental Statement and a request for an amendment to the operating license, if required by the Commission's regulations. As used in this Condition 3.(d), Final Environmental Statement means the NRC Staff Final Environmental Statement related to Operation of Peach Bottom Atomic Power Station Units Nos. 2 and 3 dated April 1973, as modified by (1) the Initial Decision of the Atomic Safety and Licensing Board dated September 14, 1973, (2) the Supplemental Initial Decision of the Atomic Safety and Licensing Board dated June 14, 1974, (3) the Decision of the Atomic Safety and Licensing Appeal Board dated July 5, 1974, (4) the Memorandum and Order of the Commission dated August 8, 1974, (5) any further modification resulting from further review by the Appeal Board and by

the Commission, if any, and (6) any Environmental Impact Appraisal which has been or may be issued by the NRC since the FES was published in April 1973.

4. This license is effective as of the date of issuance and shall expire at midnight on August 8, 2013.

FOR THE ATOMIC ENERGY COMMISSION

Original Signed by R. C. DeYoung, for

A. Giambusso, Deputy Director
for Reactor Projects
Directorate of Licensing

Attachments:

Appendices A and B -
Technical Specifications

Date of Issuance: October 25, 1973