



PECO ENERGY

PECO Energy Company  
965 Chesterbrook Blvd.  
Wayne, PA 19087-5691

May 10, 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 94-01

Dear Sir:

PECO Energy Company hereby submits Technical Specifications (TS) Change Request No. 94-01, in accordance with 10CFR50.90 requesting changes to Appendix A of the Peach Bottom Facility Operating Licenses. Attachment 1 to this letter describes the proposed changes and provides justification for the change. Attachment 2 provides the revised TS pages.

This submittal requests changes to the Unit 2 and Unit 3 TS governing minimum low pressure cooling availability when irradiated fuel is in the reactor vessel and the reactor is in the Cold Condition. The proposed changes would make these TS Sections identical to the corresponding Limiting Conditions for Operation and Surveillance Requirements in NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4."

PECO Energy requests that these proposed changes be effective prior to the start of refueling outage 2R10, scheduled for September 16, 1994. Approval of these changes will result in increased flexibility of scheduling outage activities. 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

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Page 2.

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

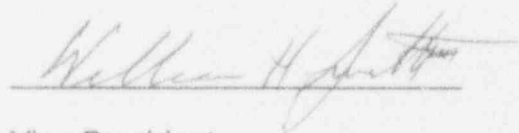
COMMONWEALTH OF PENNSYLVANIA :

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 94-01) 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 10<sup>th</sup> day  
of May 1994.



Notary Public

Notarial Seal  
Erica A. Santoni, 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

TECHNICAL SPECIFICATIONS CHANGE REQUEST  
94-01

"Minimum Low Pressure Cooling Availability  
when the Reactor is in the Cold Condition"

Supporting Information for Changes - 6 Pages

PECO Energy Company, Licensee under Facility Operating Licenses DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station (PBAPS), Unit No. 2 and Unit No. 3, respectively, requests that the Technical Specifications (TS) be amended as proposed below to make Sections governing minimum low pressure cooling availability when irradiated fuel is in the reactor vessel and the reactor is in the Cold Condition to be identical with the corresponding Limiting Conditions for Operations (LCO) and Surveillance Requirements (SR) in NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4."

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 TS pages for Units 2 and 3 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 the TS Section titles in the Table of Contents (page i) to agree with the TS Section titles in the body of the TS.
2. Revise TS Section 3.5.A.1 (page 125) to provide proper reference to the revised TS Section 3.5.F.
3. Revise TS Section 3.5.A.3 (page 126) to provide proper reference to the revised TS Section 3.5.F.
4. Revise TS Section 3.5.B.1 (page 127) to delete the reference to TS Section 3.5.F.3.
5. Revise TS Section 3.5.F (pages 132 and 132a) to require the LCO governing minimum low pressure cooling availability when irradiated fuel is in the reactor vessel and the reactor is in the Cold Condition to be identical with the corresponding LCO in NUREG-1433.
6. Revise TS Section 4.5.F (pages 132 and 132a) to require the SR governing minimum low pressure cooling availability when irradiated fuel is in the reactor vessel and the reactor is in the Cold Condition to be identical with the corresponding SR in NUREG-1433.
7. Revise TS BASES 3.5.A (page 134) to delete the reference to the Core Spray Subsystem as also providing a source for flooding of the core in case of accidental draining because the information is being added to TS BASES 3.5.F.

8. Revise TS BASES 3.5.F (page 139) to be consistent with the corresponding TS BASES in NUREG-1433.
9. Revise TS BASES 4.5 (pages 141 and 141a) to be consistent with the corresponding TS BASES in NUREG-1433. Page 141b is revised to accommodate information previously on page 141a.
10. Revise TS Section 3.7.A.1 (page 165) to provide proper reference to the revised TS Section 3.5.F.

### Safety Assessment

Proposed changes 1, 2, 3, 4, 7, 8, 9 and 10 are administrative in nature and do not involve any technical changes. These proposed changes have no impact on any safety analysis assumptions. Because these changes are administrative in nature, no question of safety is involved.

Proposed changes 5 and 6 incorporate more restrictive changes into the current TS by either making current requirements more stringent or adding new requirements which currently do not exist. Requirements have been added for two low pressure Emergency Core Cooling System (ECCS) injection/spray subsystems to be Operable. In addition, Actions have been provided for the Condition of one low pressure ECCS injection/spray subsystem inoperable. These Actions allow 4 hours to restore the inoperable subsystems or require action to be immediately initiated to suspend operations with a potential for draining the reactor vessel (OPDRVs). With two ECCS injection/spray subsystems inoperable, additional actions have been provided to restore one inoperable subsystem within 4 hours or to immediately initiate action to minimize the potential of a fission product release to the environment. The current requirements for ECCS subsystems in Specification 3.5.F.4 apply during refueling when fuel and LPRM removal and replacement are being performed. The Applicability for ECCS subsystems has been expanded to include all refueling operations (except when certain water level requirements are met as allowed by current Specification 3.5.F.4.b). Appropriate Surveillance Requirement for the low pressure ECCS subsystems have been added and helps ensure the low pressure ECCS subsystems are maintained Operable. These changes will not impact any safety analysis assumptions and are consistent with NUREG-1433.

Proposed changes 5 and 6 also make three less restrictive changes. The first change deletes the requirements for the containment cooling system when the reactor is in the Cold Condition. When the reactor is in the Cold Condition, the probability and consequences of a Design Basis Accident (DBA) which could cause a release of radioactive material to primary containment and cause heatup and pressurization of primary containment are reduced due to the pressure and temperature limitation. As a result, primary containment is not required to be Operable with the reactor in the Cold Condition and the containment cooling system is not required to maintain containment within design limits with the reactor in the Cold Condition. This change is consistent with NUREG-1433.



The current requirement that both core spray systems and the Low Pressure Coolant Injection (LPCI) system be Operable during a refueling outage is being relaxed by the second change to require one core spray subsystem and one LPCI subsystem or two core spray subsystems to be Operable. This is considered acceptable since the long term cooling analysis following a design basis Loss of Coolant Accident (LOCA) demonstrates only one low pressure ECCS injection/spray subsystem is required, post LOCA, to maintain the peak cladding temperature below the allowable limit. To provide redundancy, a minimum of two low pressure ECCS injection/spray subsystems are required to be Operable. The required low pressure ECCS subsystems also ensure adequate vessel inventory makeup is available in the event of an inadvertent vessel draindown. As a result of the change to the number of low pressure ECCS injection/spray subsystems required, a corresponding change has also been made to the actions. With one low pressure ECCS subsystem inoperable, the required subsystem must be restored within 4 hours instead of the existing 30 day allowed outage time. If the subsystem is not restored in the specified time period, action must be immediately taken to suspend operations with a potential for draining the reactor vessel. These actions minimize the potential for a vessel draindown and subsequent potential fission product release when a single failure concurrent with a vessel draindown could result in no low pressure ECCS subsystems being available for mitigation of the event.

The final less restrictive change will allow low pressure injection/spray subsystems to be inoperable during a refueling outage if the spent fuel storage gates are removed and the water level is at the required height above the reactor pressure vessel flange. This is acceptable to not require ECCS subsystems to be Operable since the water level requirement provides sufficient coolant inventory to allow operator action to terminate any inventory loss prior to fuel uncover in the event of an inadvertent draindown.

#### No Significant Hazards Considerations

The changes proposed in this Application do not constitute a significant hazards consideration in that:

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

Proposed changes 1, 2, 3, 4, 7, 8, 9 and 10 are administrative in nature and involve no technical changes to the TS. These proposed changes do not impact initiators of analyzed events or the assumed mitigation of accidents or transients events. Therefore, these changes do not involve an increase in the probability or consequences of an accident previously evaluated.

Proposed changes 5 and 6 will not increase the probability of initiating an analyzed event or alter assumptions relative to mitigation of an accident or transient event. These changes will not alter the operation of process variables or systems, structures, or components (SSC) as described in the safety analyses. These changes do not involve any physical changes to plant SSC. TS requirements that govern Operability or routine testing and verification of plant components and variables are not assumed to be initiators of any analyzed event. The proposed changes will not alter the operation of equipment assumed to be available for the mitigation of accidents or transients by the plant safety analysis or licensing basis. The proposed changes establish or maintain adequate assurance that components are operable when necessary for the prevention or mitigation of accidents or transients and that plant variables are maintained within limits necessary to satisfy the assumptions for initial conditions in the safety analysis. These changes have been confirmed to ensure no previously evaluated accident has been adversely affected. These changes will not allow continuous plant operation with plant conditions during a unit outage such that a single failure will result in a loss of any safety function. Therefore, the changes will not involve a significant 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 accident previously evaluated.

The proposed changes do not involve a physical alteration of the plant (no new or different type of equipment will be installed or removed) and will not alter the method used by any system to perform its design function. The proposed changes do not allow plant operation in any mode that is not already evaluated. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

- iii) The proposed changes do not involve a significant reduction in a margin of safety.

Proposed changes 1, 2, 3, 4, 7, 8, 9 and 10 are administrative in nature and will not involve any technical changes. These proposed changes will not reduce a margin of safety because they have no impact on any safety analysis assumptions. Because these changes are administrative in nature, no question of safety is involved. Therefore, these changes do not reduce the margin of safety.

Proposed changes 5 and 6 add some new requirements and make some existing requirements more restrictive. These changes will not impact any safety analysis assumptions. Adding new requirements and making existing ones more restrictive either increases or does not affect the margin of safety. As such, no question of safety is involved. Therefore, these changes will not involve a significant reduction in a margin of safety.



Proposed changes 5 and 6 also make three less restrictive changes. The first change deletes the requirements for the containment cooling system when the reactor is in the Cold Condition. The containment cooling system is necessary to maintain primary containment Operable to mitigate the release of radioactive material following a DBA. However, primary containment is not required to be Operable with the reactor in the Cold Condition. As a result the containment cooling system is not needed to maintain the primary containment Operable with the reactor in the Cold Condition. This change does not affect any safety limits, operating limits, or design assumptions. This change provides the benefit of allowing maintenance to be performed on the containment cooling systems during a unit outage to ensure their reliability during power operation. Therefore, this change does not involve a significant reduction in a margin of safety.

The current TS requirement that both core spray systems and the LPCI system be Operable during a refueling outage is being relaxed by the second change to require one core spray subsystem and one LPCI subsystem or two core spray subsystems to be Operable. This change does not adversely affect any accident or transient analyses because the change ensures adequate vessel inventory makeup is available in the event of an inadvertent vessel draindown. The long term cooling analysis following a design bases LOCA demonstrates only one low pressure ECCS injection/spray subsystem is required, post LOCA, to maintain the peak cladding temperature below the allowable limit. This change will not affect any safety limits, operating limits, or design assumptions. This change provides the benefit of allowing maintenance to be performed on the low pressure ECCS subsystems not required to be operable to ensure their reliability during plant operation. Therefore, this change does not involve a significant reduction in a margin of safety.

The final less restrictive change will allow low pressure injection/spray subsystems to be inoperable during a refueling outage if the spent fuel storage gates are removed and the water level is at the required height over the top of the reactor pressure vessel flange. This is acceptable because the water level requirement provides sufficient coolant inventory to allow operator action to terminate any inventory loss prior to fuel uncover in the event of an inadvertent draindown. This change will not affect any safety limits, operating limits, or design assumptions. This change provides the benefit of allowing maintenance to be performed on the low pressure ECCS subsystems to ensure their continued reliability during plant operation. Therefore, this change does 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 provided for under 10CFR51.22(c)(9). The requested changes will have no impact on the environment. The proposed changes do not involve a Significant Hazards Consideration as discussed in the preceding section. 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. The proposed changes would not authorize any change in the authorized power level of the facility. In addition, the proposed changes do not involve a significant increase in individual or cumulative occupation radiation exposure.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed the proposed changes to the TS 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 SPECIFICATIONS CHANGE REQUEST  
94-01

List of Attached Pages

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141b	141b
165	165