

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

May 9, 1994

Docket No. 50-171
License No. DPR-12

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

Subject: Peach Bottom Atomic Power Station, Unit 1
Technical Specifications Change Requests 93-30 and 94-02

Dear Sir:

PECO Energy Company hereby submits Technical Specifications (TS) Change Requests Nos. 93-30 and 94-02, in accordance with 10CFR50.90 requesting changes to the Possession-Only License and TS for the Peach Bottom Atomic Power Station, Unit 1. The proposed changes reflect the name change of Philadelphia Electric Company to PECO Energy Company, provide proper reference to 10CFR20 requirements, and reduce the required frequency for performing periodic inspections in the containment vessel below ground level for water accumulation.

Attachment 1 to this letter describes the proposed changes and provides justification for the changes. Attachment 2 provides the revised pages to Possession-Only License DPR-12 and its TS.

If you have any questions regarding this matter, please contact us.

Very truly yours,

A handwritten signature in cursive script that reads "G. A. Hunger, Jr.".

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

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ADD


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 Requests (Numbers 93-30 and 94-02) for Peach Bottom Facility Operating Licenses DPR-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 5th day
of May 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
UNIT 1

Docket No. 50-171

License No. DPR-12

TECHNICAL SPECIFICATIONS CHANGE REQUESTS
93-30 and 94-02

"Name Change, Proper References to 10CFR20,
and Inspection of Accessible Areas of the
Containment Building Below Ground Level for
Water Accumulation"

Supporting Information for Changes - 3 Pages

PECO Energy Company requests that the Possession-Only License and Technical Specifications (TS) for the Peach Bottom Atomic Power Station (PBAPS), Unit 1, be amended as proposed below to reflect the name change of Philadelphia Electric Company to PECO Energy Company, to provide proper references to 10CFR20 as a result of the new table number in 10CFR20 Appendix B, and to reduce the required frequency for performing the periodic inspection for water accumulation in the containment vessel below ground level from monthly to semi-annually.

Provided below is 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 License No. DPR-12 and TS Section 1.0 to change the name of the owner and licensee of PBAPS Unit 1 to PECO Energy Company.
2. Revise TS Section 2.1(b)(8) to provide proper reference to 10CFR20 as a result of the new table number in 10CFR20 Appendix B.
3. Relocate the description in TS Section 2.3(a) to become TS Section 2.3(b)4.

Safety Assessment

Proposed changes 1 and 2 are administrative in nature. Proposed change 3 is adequate to ensure containment building integrity is being maintained with respect to ground water and reduces the burden on plant personnel to allow them to focus on the operation of PBAPS Units 2 and 3.

Information Supporting a Finding of No Significant Hazards Considerations

The changes proposed in this 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 required frequency for performing the periodic inspection for water accumulation in the containment vessel below ground level does not impact the probability of ground water intrusion into the containment building. Proposed change 3 maintains adequate assurance that integrity of the containment building with respect to ground water entry will be maintained. The design of Unit 1 makes it very difficult for ground water to reach the exterior of the containment liner to start the metal corrosion process. The concrete layer between the rock and the containment liner serves as a barrier to prevent water migration to the liner shell. A cathodic protection system provides protective current to the containment liner as well as nearby underground piping. The steel containment liner of Unit 1 should not corrode under the present environmental conditions or any anticipated future conditions even without an operating cathodic protection system. Monthly inspections from May, 1990 (following issuance of Amendment No. 7 to the Possession-Only License No. DPR-12 on April 25, 1990) through April, 1994 have not detected any water in the containment building. Prior to Amendment No. 7, the inspection of Unit 1 was performed semi-annually. A review of these semi-annual inspections dating back to October, 1981 determined that water has never been detected in the accessible areas below ground level in the containment building. The TS limit water accumulation in the containment sump to 500 gallons. Twelve and one-half years of inspections have confirmed the reliability of the design of Unit 1 to maintain integrity against any ground water intrusion. There is no reason, based on the review of inspection data, why the inspection could not be performed semi-annually rather than monthly. 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 affect the plant SAFSTOR status. 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 plant SAFSTOR status. Because proposed changes 1 and 2 are administrative in nature, they do not involve a question of safety. The semi-annual inspection of the accessible areas below ground level in the containment building for water accumulation, as proposed by change 3, is adequate to ensure containment building integrity is maintained with respect to ground water. 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.

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
UNIT 1

Docket No. 50-171

License No. DPR-12

TECHNICAL SPECIFICATIONS CHANGE REQUESTS
93-30 and 94-02

List of Attached Pages

License No. DPR-12
Appendix A (4 pages)

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

PECO ENERGY COMPANY

DOCKET NO. 50-171

PEACH BOTTOM ATOMIC POWER STATION UNIT 1

RENEWAL OF POSSESSION-ONLY LICENSE

Amendment No. 7
License No. DPR-12

- I. The Nuclear Regulatory Commission (the Commission) has found that:
- A. The application for renewal of License No. DPR-12 filed by PECO Energy Company, formerly Philadelphia Electric Company, (the licensee) dated November 24, 1975 as revised by letters dated March 4, 1987, December 16, 1988, July 12, 1989 and August 23, 1989, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter 1;
 - B. The facility will be maintained in conformity with the application, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amended license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter 1;
 - D. The licensee is technically and financially qualified to engage in the activities authorized by this amended license in accordance with the regulations of the Commission;
 - E. The licensee has satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;
 - F. The issuance of this amended license will not be inimical to the common defense and security or to the health and safety of the public;
 - G. The issuance of this license is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied; and
 - H. The possession and storage of byproduct material as authorized by this amended license will be in accordance with the Commission's regulations in 10 CFR Part 30, including 10 CFR Section 30.33;

2. Accordingly, License No. DPR-12, is hereby amended in its entirety to read as follows:

- A. This amended license applies to the Peach Bottom Atomic Power Station Unit 1, a permanently shutdown, high temperature, gas cooled, demonstration power reactor and associated equipment (the facility) owned by the PECO Energy Company. The facility is located at the licensee's site in York County, Pennsylvania, and is described in the application for renewal dated November 24, 1975 as revised March 4, 1987, December 16, 1988, July 12, 1989 and August 23, 1989.
- B. Subject to the conditions and the requirements incorporated herein, the Commission hereby licenses the PECO Energy Company;
- (1) Pursuant to Section 104(b) of the Act and 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities" to possess but not operate the facility.
 - (2) Pursuant to the Act and 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material" to possess, but not to separate, such byproduct material as may have been produced by operation of the facility.
- C. This license shall be deemed to contain and be subject to the conditions specified in Part 20, Section 30.34 of Part 30, Section 50.59 of Part 50, 10 CFR Chapter 1, and 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) PECO Energy Company shall not dismantle or dispose of the facility without prior approval of the Commission.
 - (2) Technical Specifications
The Technical Specifications contained in Appendix A as revised through Amendment No. 8 are hereby incorporated in this license. The licensee shall maintain the facility in accordance with the Technical Specifications.
- D. This amended license is effective as of the date of issuance and shall expire on December 24, 2015.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed by G. M. Holahan
Gary M. Holahan, Acting Director
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosure:
Appendix A Technical Specifications

Dated: April 25, 1990