

## PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000 December 31, 1990

Docket Nos. 50-277  
50-278License Nos. DPR-44  
DPR-56U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3  
Technical Specifications Change RequestREFERENCE: Letter from D. R. Helwig (PECo) to  
U.S. Nuclear Regulatory Commission dated  
June 4, 1990

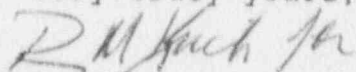
Dear Sir:

Philadelphia Electric Company (PECo) hereby submits Technical Specifications Change Request (TSCR) No. 86-08, in accordance with 10 CFR 50.90, requesting a change to Appendix A of the Peach Bottom Facility Operating Licenses. The proposed changes concern the structural integrity portion of the Technical Specifications, and include a statement recommended by NRC Generic Letter (GL) 88-01. In the above referenced letter, PECo committed to provide an appropriate TSCR related to GL 88-01 by December 31, 1990.

Attachment 1 to this letter describes the proposed changes, and provides justification for the changes. Attachment 2 contains the revised Technical Specification pages.

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

Very truly yours,

G. J. Beck, Manager  
Licensing Section  
Nuclear Engineering & Services

Enclosures: Affidavit, Attachment 1, Attachment 2

cc: T. T. Martin, Administrator, Region I, USNRC  
J. J. Lyash, USNRC Senior Resident Inspector, PB  
T. M. Gerusky, Commonwealth of Pennsylvania

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COMMONWEALTH OF PENNSYLVANIA:

: SS.

COUNTY OF CHESTER :

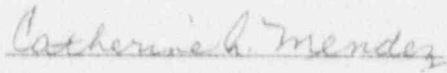
D. R. Helwig, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company; the Applicant herein; that he has read attached Technical Specifications Change Request (Number 86-08) for changes to 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.

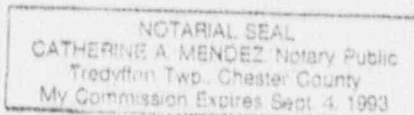


Vice President

Subscribed and sworn to  
before me this 27<sup>th</sup> day  
of December 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 SPECIFICATION CHANGE REQUEST  
86-08

"Revisions to Inservice Inspection Requirements"

Supporting Information for Changes 6 pages

Docket Nos. 50-277  
50-278

License Nos. DPR-44  
DPR-56

Philadelphia Electric Company (PECo), 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 contained in Appendix A to the Operating Licenses be amended. Proposed changes to the Technical Specifications are indicated by vertical bars in the margins of the pages contained in Attachment 2 and listed here: vi, 149b, 150, 161, 162 and 163.

The proposed changes concern the Surveillance Requirements (4.6.G) and the associated Bases for the Structural Integrity portion of the Technical Specifications. Included in these proposed changes is the addition of a statement recommended by Item 3 of NRC Generic Letter 88-01 "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping."

Licensee proposes that these changes be effective as of the issuance date of the license amendment.

#### Description of Changes

Licensee proposes the following changes:

- (1) Delete existing Surveillance Requirement 4.6.G on page 149b.
- (2) Delete existing Table 4.6.1 entitled "In-service Inspection Program for Peach Bottom Units 2 and 3" on page 150.
- (3) Insert proposed Surveillance Requirement 4.6.G.1 on page 149b which states:

"Inservice inspection of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where relief has

been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i) and (a)(3)."

- (4) Insert proposed Surveillance Requirement 4.6.G.2 on page 149b which states:

"The Augmented Inservice Inspection (ISI) Program for piping shall be performed in accordance with the staff positions on schedule, methods, personnel and sample expansion as provided by NRC Generic Letter 88-01 or in accordance with alternate measures approved by the NRC staff."

- (5) Insert proposed Surveillance Requirement 4.6.G.3 on page 149b which states:

"Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supercede the requirements of any Technical Specification."

- (6) Delete the existing Bases for 3.6.G and 4.6.G on pages 161, 162 and 163 and replace them with a discussion which reflects the proposed specifications.

- (7) Revise Table of Contents page vi to reflect deletion of Table 4.6.1.

### Safety Discussion

Change Requests (1) and (2) are proposed to delete obsolete provisions in the Technical Specifications. These provisions refer to the ISI Program which was in effect prior to the development of a 10-year ISI Program pursuant to 10 CFR 50.55a(g). Deletion of the existing provisions will enhance safety by eliminating confusion in interpreting the specifications.

Change Request (3) is proposed to incorporate the ISI portion of Surveillance Requirement 4.0.5.a (page 3/4 0-2) of the Standard Technical Specifications (STS) for General Electric Boiling Water Reactors, NUREG-0123, Revision 3. Section XI of

the ASME Boiler and Pressure Vessel Code is already a requirement for licensees because it is incorporated by reference in 10 CFR 50.55a.

Change Request (4) is proposed to comply with the guidance provided by the NRC in Generic Letter 88-01. The staff positions described in the Generic Letter were developed as a result of extensive research into intergranular stress corrosion cracking (IGSCC) problems. The staff states in the Generic Letter that if the staff positions are implemented, adequate levels of piping integrity and reliability can be achieved.

Change Request (5) is proposed to incorporate Surveillance Requirement 4.0.5.e (page 3/4 0-2) of the STS. Inclusion of this statement ensures that any discrepancies between the ASME Code requirements and the Technical Specifications are appropriately resolved.

Change Request (6) is proposed to make the Bases consistent with Limiting Condition for Operation 3.6.G and proposed Surveillance Requirement 4.5.G. Consistency between the Bases and the specifications to which they refer enhances safety by ensuring proper understanding and interpretation of the specifications. The Bases proposed were modeled after those of the STS found on Page B 3/4 4-5.

Change Request (7) is a purely administrative change which affects the Table of Contents only. This request is proposed to delete Table 4.6.1 from the List of Tables. This request has no impact on safety.

#### No Significant Hazards Consideration

Two examples provided by the Commission of a change involving no significant hazards consideration, as stated in 51 FR 7751 are: Example ii, "A change that constitutes an additional limitation, restriction or control not presently included in the technical specifications, e.g., a more stringent surveillance requirement"; and Example vii, "A change to conform a license to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations." The change requests proposed in this Application conform to these examples and 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.

These proposed changes delete obsolete provisions in the Technical Specifications and replace them with provisions of the Standard Technical Specifications (STS) for General Electric Boiling Water Reactors, NUREG-0123, Revision 3. This will enhance safety by eliminating any potential confusion associated with the obsolete provisions.

These proposed changes also incorporate requirements to adhere to the NRC staff positions on schedule, methods, personnel, and sample expansion as provided by NRC Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping." Implementation of this requirement will increase the inspection frequency of various welds susceptible to intergranular stress corrosion cracking (IGSCC). This increased inspection frequency will allow early identification of any potential structural integrity hazards, thereby reducing the probability of any accidents previously evaluated, specifically, accidents associated with pipe breaks.

These proposed changes do not affect the initial conditions or precursors assumed in any Updated Final Safety Analysis Report Section 14 accident analyses. Further, these proposed changes do not decrease the effectiveness of equipment relied upon to mitigate the previously evaluated accidents.

- ii) The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

These proposed changes will enhance the reliability of components contributing to the structural integrity of the plant. Implementation of these proposed changes will not affect the design function or configuration of any component or introduce any new operating scenarios or failure

modes. Therefore, these proposed changes do not create the possibility of a new or different kind of accident.

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

These proposed changes impose additional restrictions which have already been approved by the NRC through issuance of the Standard Technical Specifications and Generic Letter 88-01. These proposed changes do not adversely affect the assumptions or sequence of events used in any accident analysis and consequently do not reduce any margin of safety.

#### 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 proposed changes do not involve any systems that have a direct relationship with the environment. The changes involve the structural integrity of ASME Code Class 1, 2 and 3 components. 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 will be no significant increase in individual or cumulative occupational radiation exposure.

#### Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes and have concluded that they do not involve an unreviewed safety question and are not a threat to the health and safety of the public.