

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

February 13, 1991

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 & 3
Technical Specifications Change Request

REFERENCE: Letter from G. A. Hunger, Jr. (PECo) to
U.S. Nuclear Regulatory Commission dated
February 26, 1990

Dear Sir:

In the above referenced letter Philadelphia Electric Company (PECo) submitted, in accordance with 10 CFR 50.90, Technical Specifications Change Request (TSCR) Nos. 89-13 and 89-14 which requested changes to Appendix A of the Peach Bottom Facility Operating Licenses. TSCR 89-14, which was discussed as the Category B changes in the above referenced letter, involved adding requirements to the Technical Specifications (TS) for the Independent Safety Engineering Group (ISEG).

PECo hereby requests that our original submittal be revised, specifically, that the title of "President" be added to proposed TS 6.2.3.4. Accordingly, PECo requests that proposed TS 6.2.3.4 read:

"The ISEG reports to the General Manager, Nuclear Quality Assurance. If any significant nuclear quality concern identified by the ISEG is not adequately resolved, the General Manager, Nuclear Quality Assurance shall notify the Nuclear Review Board, the Executive Vice President-Nuclear, the President, or the Nuclear Committee of the Board. If the ISEG is not satisfied with the resolution of any significant nuclear quality concern by the General Manager, Nuclear Quality Assurance, the ISEG shall notify the Nuclear Review Board of that concern."

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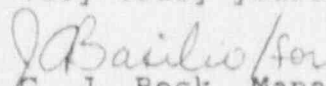
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A revised page 245b for each unit is enclosed. We have concluded that the addition of "President" to proposed TS 6.2.3.4 further enhances the authority of the ISEG. We have determined that this revision does not alter our evaluation of any of the 10 CFR 50.59 standards, and therefore, does not affect our conclusion that TSCR 89-14 does not constitute an unreviewed safety question. We have also concluded that the proposed revision does not affect the Finding of No Significant Hazards Consideration, the Environmental Impact Assessment or any conclusions previously submitted regarding the addition of ISEG to the TS.

If you have any questions concerning this matter, please do not hesitate to contact us.

Very truly yours,



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

Enclosure: Affidavit
Proposed TS Page 245b

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

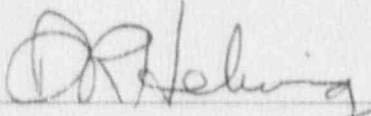
COMMONWEALTH OF PENNSYLVANIA:

: SS.

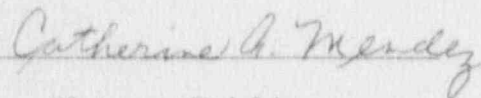
COUNTY OF CHESTER :

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

That he is Vice President of Philadelphia Electric Company; that he has read the request to revise the Technical Specifications Change concerning the Independent Safety Engineering Group (ISEG), 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 23rd day
of January 1991.



Notary Public

NOTARIAL SEAL
CATHERINE A. MENDEZ, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires Sept. 4, 1993