

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

June 1, 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

Supplemental Information Regarding Technical

Specification Change Request 91-06

REFERENCE: 1) Letter from G. A. Hunger, Jr. (PECO Energy Company) to NRC dated November 1, 1993

 Letter from G. A. Hunger, Jr. to NRC dated February 18, 1994

 Letter from S. Dembek, (NRC) to G. A. Hunger, Jr. dated March 15, 1994

## Dear Sir:

In the Reference 1 letter, PECO Energy Company (PECO Energy) submitted Technical Specification Change Request (TSCR) 91-06, requesting changes to Appendix A of the Peach Bottom Atomic Power Station (PBAPS) Operating Licenses to support the replacement of the obsolete control room ventilation radiation monitoring equipment. In TSCR 91-06, we stated that the new control room ventilation radiation monitoring equipment will be operated in the statistical mode. The new system has the option of being operated in either the statistical or time filtering mode. In Reference 2, we responded to an NRC question regarding system responsiveness by stating that the responsiveness of the new system, while being operated in the statistical mode, would be equal to or better than the existing system. In Reference 3, the NRC approved TSCR 91-06 by amendments 184/189.

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During the installation and testing of the new radiation monitoring equipment, the system experienced stability problems, and the system was placed in the time filtering mode to see if the stability problems would be eliminated. By telephone call on May 6, 1994, we informed the PBAPS NRC Project Manager of our plans to utilize the time filtering mode of operation. The NRC Project Manager stated that TSCR 91-06 was approved partly on the basis that the responsiveness of the new system, while being operated in the statistical mode, was equal to or greater than the previous system, and guestioned whether or not that responsiveness would be maintained while being operated in the time filtering mode. We stated that the system responsiveness would be maintained regardless of the mode of operation selected (i.e., the new system operated in either the time filtering or statistical mode would be as responsive as the previous system). At the conclusion of the telephone call, the NRC Project Manager requested that PECO Energy provide a follow up letter restating the information provided concerning the new system responsiveness. This letter serves as that follow up.

We have characterized the performance of the system in both modes. The overall responsiveness of the new system, regardless of the mode of operation, is equal to or better than the previous system for expected levels of activity if an accident were to occur. However, at low activity levels, i.e., close to the Technical Specifications control room radiation monitor trip level setting of <400 counts per minute (cpm), coupled with a low rate of rise of activity, the new system's response time will be slightly slower than the previous system.

The impact of this slightly slower response at low activity levels is negligible. We have determined that the increase in radiation exposure to control room personnel as a result of the difference in system responsiveness would be negligible and that the exposure that control room personnel would receive during an accident remains well below the criteria of 10 CFR 50 Appendix A, General Design Criteria 19, "Control Room."

The PBAPS Plant Operations Review Committee has reviewed the change in operating modes.

If you have any questions or require additional information please contact me.

Sincerely,

G. A. Hunger, Jr., Director

Licensing Section

Attachment: Affidavit

cc: T. T. Martin, Administrator, Region I, USNRC

W. L. Schmidt, Senior Resident Inspector, PBAPS, USNRC

R. R. Janati, Commonwealth of Pennsylvania

COMMONWEALTH OF PENNSYLVANIA

SS.

COUNTY OF CHESTER

William 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 supplemental information for Technical Specification Change Request (TSCR 91-06) for changes to the 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 /5

, June

1994.

Notary Public

Notarial Seal Erica A. Santon, Notary Public Tredyffin Twp., Chester County My Commission Expires July 10, 1995