Station Support Department
10CFR50.90

PECO ENERGY

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

June 9, 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 94-06

Dear Sir:

PECO Energy Company hereby submits Technical Specifications (TS) Change Request No. 94-06, 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 Surveillance Requirements for scram insertion times. The proposed changes would make these Surveillance Requirements similar to the 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 in scheduling activities to satisfy the Surveillance Requirements governing scram insertion times. If you have any questions regarding this matter, please contact us.

Very truly yours,

for M. C. Kray

G. A. Hunger, Jr., Director
Licensing

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Enclosures: Affidavit, Attachment 1, Attachment 2

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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 94-06) 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 9th day
of June 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
UNITS 2 AND 3

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

TECHNICAL SPECIFICATIONS CHANGE REQUEST
94-06

"Surveillance Requirements for Scram Insertion Times"

Supporting Information for Changes - 4 Pages

Docket Nos. 50-277
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License Nos. DPR-44
DPR-56

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 Surveillance Requirements (SR) governing scram insertion times to be similar to the corresponding 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 SR 4.3.C.1 (page 103) to require that each control rod be scram time tested after each refueling outage or after a reactor shutdown that is greater than 120 days with reactor steam dome pressure greater than or equal to 800 psig prior to exceeding 40% of Rated Power. Scram time testing is not required for control rods inserted per Specification 3.3.B.1.

2. Replace SR 4.3.C.2 (page 104) with the requirement to perform scram time testing with the reactor steam dome pressure greater than or equal to 800 psig prior to exceeding 40% of Rated Power for only those control rods associated with the core cells affected by any fuel movement within the reactor pressure vessel.

3. Add SR 4.3.C.3 (page 104) to perform scram time testing for a representative sample of control rods at least once per 120 days of power operation with the reactor steam dome pressure greater than or equal to 800 psig.

4. Add SR 4.3.C.4 (page 104) to perform scram time testing at any reactor steam dome pressure for individual control rods prior to declaring them operable after work on the control rod or control rod drive system is performed that could affect scram insertion time. Scram times as a function of reactor steam dome pressures less than 800 psig are provided in the Core Operating Limits Report.

5. Revise TS BASES 3.3.C and 4.3.C (pages 111 through 113) to describe: the rationale for performing scram time testing with reactor pressure greater than or equal to 800 psig; the rationale for requiring control rods to be scram time tested once per 120 days; what constitutes a representative sample of control rods; examples of work that could affect scram times; and the rationale and methods for performing scram time testing following work that could affect the scram insertion times. All discussion of scram performance of Dresden 2 and 3 during pre-operational and startup testing has been deleted.

6. Add SR 4.3.C.5 (page 104) to perform scram time testing with the reactor steam dome pressure greater than or equal to 800 psig prior to exceeding 40% of Rated Power after work on the control rod or control rod drive system that could affect scram insertion time.

7. Revise SR 4.5.K.2 (page 133b) from performing scram time testing of 19 or more control rods on a rotation basis to performing scram time testing of a representative sample of control rods. This provides consistency with SR 4.3.C.3 and TS BASES 3.3.C and 4.3.C.

Safety Assessment

Currently, following a refueling outage, control rod scram time testing for any control rod fully withdrawn during startup, must be performed during operational hydrostatic testing or during startup prior to synchronizing the main turbine generator. Any control rods not tested during the startup must be tested at greater than 30% power but less than 40% power.

Proposed change 1 will require that scram time testing for all control rods be completed prior to exceeding 40% Reactor Power. This change is acceptable based on industry experience with control rod scram time testing coupled with the additional requirement in proposed change 4 that scram time testing of any control rod on which work was performed must be satisfactorily completed before that control rod can be declared operable. Proposed changes 2, 3, 4 and 6 add some new requirements and make some existing requirements more restrictive. These changes do not impact any safety analysis assumptions and are consistent with NUREG-1433.

Proposed change 5 revises the BASES to accurately reflect the previously discussed SR changes. Consistency between the BASES and their corresponding specifications is necessary to avoid misinterpretations and to enhance the understanding of the intent of the requirements. These proposed changes have no impact on any safety analysis assumptions.

Proposed change 7 is administrative in nature and does not involve any technical changes. This proposed change has no impact on any safety analysis assumptions. The requirement of performing scram time testing of a representative sample of the 185 control rods is equivalent to scram time testing of 19 or more control rods on a rotation basis. Because these changes are administrative in nature, no question of safety is involved.

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.

The proposed changes will not involve any physical changes to plant systems, structures, or components (SSC). These proposed changes will not alter operation of process variables or SSC as described in the safety analysis. 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. In particular, proposed change 1 is acceptable based on industry experience with control rod scram time testing coupled with the additional requirement in proposed change 4 that scram time testing of any control rod on which work was performed must be satisfactorily completed before that control rod can be declared operable. The proposed changes will not allow continuous plant operation with plant conditions 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 alter the plant configuration (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.

Following a refueling outage, control rod scram time testing for all control rods is currently required to be performed during operational hydrostatic testing or during startup prior to synchronizing the main turbine generator. Any control rods not tested during operational hydrostatic testing must be tested at greater than 30% power but less than 40% power. Proposed change 1 will require that scram time testing for all control rods be completed prior to exceeding 40% Reactor Power. This change is acceptable based on industry experience with control rod scram time testing coupled with the additional requirement in proposed change 4 that scram time testing of any control rod on which work was performed must be satisfactorily completed before that control rod can be declared operable. Proposed changes 2, 3, 4 and 6 add some new requirements and make some existing requirements more restrictive. The margin of safety is not reduced by more restrictive changes. If anything, the margin of safety may increase. Proposed change 5 revises the BASES to provide consistency with the previously discussed SR changes. Proposed change 7 is administrative in nature and does not involve any technical changes. Proposed changes 5 and 7 will not reduce a margin of safety because they have no impact on any safety analysis assumptions. Therefore, these changes will 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.