50-277



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

March 13, 1995

LICENSEE: PECO Energy Company (PECO)

FACILITY: Peach Bottom Atomic Power Station, Units 2 and 3

SUBJECT: SUMMARY OF MARCH 6, 1995 MEETING BETWEEN NRC AND PECO REGARDING IMPROVED TECHNICAL SPECIFICATIONS (TAC NOS. M90746 and M90747)

On March 6, 1995, the NRC staff met with PECO representatives at the NRC headquarters in Rockville, Maryland, to discuss the staff review of the licensee's application to adopt improved technical specifications (TS) at Peach Bottom Atomic Power Station, Units 2 and 3 (PBAPS). Enclosure 1 is a list of those who attended the meeting. Enclosure 2 is the agenda for the meeting.

By letter dated September 29, 1994, the licensee submitted an application to adopt improved Standard Technical Specifications (STS) based on those issued by the NRC in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," in September 1992. In a meeting on November 30, 1994, the staff and the licensee established a schedule for the review and approval of the application. The review process includes periodic meetings to discuss particular sections of the application. At the March 6, 1995 meeting, the staff and licensee discussed the staff's review to date of Section 3.8 of the proposed improved TS.

The staff developed a matrix describing the review status of each of the line items in proposed TS Section 3.8 for which the staff required additional information from PECO (Enclosure 3). Specific staff questions and comments on Section 3.8 are included in Enclosure 4. The staff provided these comments to the licensee prior to the meeting and during the meeting the licensee briefly responded to each of the comments. The licensee's response to the staff's comments are in Enclosure 5. As a result of the meeting, the staff had remaining questions and concerns with the proposed Section 3.8 TS The staff will provide an additional request for information on Section 3.8 under separate cover.

The licensee opened the meeting with an extensive discussion of the design of the Peach Bottom AC and DC power distribution systems. The normal and design basis operation of these systems was discussed, including a description of inter-unit operability features considered in the development of the proposed TS. The design of the Peach Bottom AC and DC systems varies considerably from the system upon which the NUREG-1433 STS were developed. The staff will consider the Peach Bottom specific AC and DC system design features during the continued review of Section 3.8. The handout developed by the licensee to facilitate these discussions is included as Enclosure 6.

The staff and licensee discussed lessons learned during the review of the recently issued improved TS for Georgia Power Company's Plant Hatch. Of note was the concern that certain of the proposed changes may represent

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200020 9503200374 950313 PDR ADOCK 05000277 PDR ADOCK 05000277 deviations from NUREG-1433 as well as changes to the current licensing basis for the plant. The staff asked the licensee to review their application and specifically identify any such changes. The staff will then review the technical justification for any such changes and pursue them in parallel with the review of the improved TS. The staff and licensee did discuss a list of recent, pending and planned licensing actions that will impact the final version of the Peach Bottom improved TS. This list is included as Enclosure 7.

The staff and licensee agreed that the next periodic meeting would focus on Sections 3.6 and 3.7. It was agreed that a teleconference might be adequate to address staff questions on these sections. The staff and the licensee did not set a date for the next review meeting but agreed to establish a date in the near future. The updated overall review schedule for the Peach Bottom improved TS application is included as Enclosure 8.

> Joseph W. Shea, Project Manager Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket Nos. 51-277/278

Enclosures:

- 1. Meeting At endees
- 2. Meeting Agenda
- 3. Section 3.8 Review Matrix
- Staff Comments on TS Section 3.8
- Licensee Response to Staff Comments
- 6. Licensee's Meeting Handout
- 7. Status of Related Licensing Actions
- 8. Revised Staff Review Schedule

cc w/encls: See next page

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PECO Energy Company

Peach Bottom Atomic Power Station, Units 2 and 3

cc:

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Dr. Judith Johnsrud National Energy Committee Sierra Club 433 Orlando Avenue State College, PA 16803 Meeting Attendance List NRC/PECO Energy Company

March 6, 1995

NAME

ORGANIZATION

1.	N. Gilles	NRC/OTSB
2.	J. Shea	NRC/PDI-2
3.	M. Kray	PECO
4.	G. Siefert	PECO
5.	R. Stott	PECO
6.	D. Hoffman	PECO/Excel
7.	E. Tomlinson	NRC/OTSB
8.	D. Green	PECO/Excel
9.	W. Roberts	NRC/INEL/LITCO

Enclosure 1

PEACH BOTTOM ITS MEETING - SECTION 3.8 MARCH 6, 1995 MEETING AGENDA

Generic Issues

- Relocated Requirements Justifications & Submittal Update
- + General Description of Location Needed
- + General Description of Controls Needed
- More Detailed Justification for Relocation Needed
 "Because It's Like NUREG-1433" Not Enough
- Hatch Notice Issue
- Discuss Peach Bottom Electrical Distribution System
 - Presentation by PECO
 - Questions from NRC Staff & Contractor
- Review PECO Energy Responses to NRC Questions
- Discuss Additional Areas of NRC Concern
- Discuss Status of Conowingo Amendment Review
- Assign Action Items & Set Tentative Schedule for Resolution
- Discuss Schedule for Section 3.6, 3.7, & 5.0
 - Results to PECO
 - Meeting
- Review Overall Schedule

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Peach Bottom 2/3 CTS/ITS Section 3.8 Open Items - Questions to Licensee

Tracking Number	ITS Section	CTS Section	Comment Resolution Category	Description	Comment
Question 1	None	Tbls 3.2.8 & 4.2.8	6	R_2 - Relocation of calibration requirements for Load Timers and togential Loading Relays (SV) from TS	Concern on whether calibration requirements for Sequential Loading Relays (SV) should be Relocated from TS
Question 2	None	3.9.8.5 3.5.F 3.9.8.3	6	R ₂ - Relocation of actions for DG and ECCs from battery Operability from TS to procedures developed in "Safety Function Determination Program"	Concern on whether developed procedures will be controlled by 10 CFR 50.53.
Question 3	3.8.1	4.9.A.I .2.b	6	P ₂₀ and P ₂₀ - For SRs that do not require the DG to be loaded it is proposed to eliminate requirements for DGs to meet both upper and lower voltage/frequency limits within specified time. Separate limits required after DG has achieved "steady state."	What is "steady state" and what is the time allowed for a DG to reach "steady state."
Question 4	3.8.3, Cond. E	4.9.A.1 .2.a.6	6	L ₁ - ITS LCO 3.8.3, Condition E, changes CTS required DG start air receiver pressure of ≥225 psig to <225 and ≥150 psig.	No justification provided for the reduction of CTS DG start air receiver pressure requirement in ITS LCO 3.8.3, Condition E.

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Peach Bottom 2/3 CTS/ITS Section 3.8 Open Items - Questions to Licensee

Tracking Number	ITS Section	CTS Section	Comment Resolution Category	Description	Comment
Question 5	3.8.4 Cond. A	None	6	Le - New ITS 3.8.4 requirement and associated Conditions (A/B) for required Gait 3 DC subsystems.	 Concerns: a. LCO 3.8.4, Condition A/B, allows extended Completion Times for restoration of inoperable Unit 3 DC subsystems (7 days and 12 hours) versus what is allowed for Unit 2 DC subsystems (2 hours). The NUREG discussion P₁₂ state that the proposed Completion Times are based on the restoration time allowed for the supported components (DGs and offsite circuits) affected by the inoperable Unit 3 DC subsystems. However, although the restoration times may be based on the restoration times of the supported systems, supported systems often included supplementory actions during the time the component/system is inoperable (i.e. DGs and offsite circuits). What consideration has been given for these actions which are not required when the Unit 3 and AC and DC distribution subsystems are inoperable? b. There is confusion on what LCOs/systems /components are supported by the Unit 3 AC and DC distribution subsystems. The LCO 3.8.7 statement ("Insert 3.8.7") includes a listing of 10 Unit 2 LCOs supported by the Unit 3 AC and DC distribution subsystems. Included in this list is LCO 3.8.5.1, "ECCS-Operating." The ITS proposed LCO 3.8.1 statements ("Insert 3.8.1") for Unit 3 offsite circuits (c.) and DGs (d.) only lists three LCOs (3.6.4.3, 3.7.3, and 3.8.4) supported by Unit 3 AC sources. Also, the bases discussion for DC sources states that the Unit 3 DC subsystems only provided control power for DGs and 4 kV buses. Clarification is

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Peach Bottom 2/3 CTS/ITS Section 3.8 Open Items - Questions to Licensee

Tracking Number	ITS Section	CTS Section	Comment Resolution Category	Description	Comment
Question 6 Question 7	LCO 3.8.1 RA A.3 RA B.4.2.2	None	6	The ITS LCO 3.8.1 includes specific requirements for Unit 3 offsite circuits. No specific Condition is provided for the Unit 3 offsite circuits and the Unit 3 offsite circuit is not included in the second Completion Time for Condition A (one offsite circuit inoperable). With the Conowingo tie-line available PBAPS proposes (RA B.4.2.2) to allow a required DG to be inoperable for up to 30 days (<u>PBAPS ISCR No. 93-24</u>). No second Completion Time is provided.	 Concerns: a. Why are the LCO required Unit 3 offsite circuits not included in the second Completion Time for the restoration of an inoperable offsite circuit (RA A.3). Without the inclusion of a second Completion Time the assumptions regarding allowed out of service times for AC sources could be exceeded as a result of sequential inoperabilities of DGs and Unit 3 offsite sources. b. Why is there no second Completion Time for RA B.4.2.2 (one DG inoperable and Concwingo tie-line available). Without the inclusion of a second Completion Time the assumptions regarding allowed out of service times for an AC source could be ecceeded as a result of sequential inoperabilities of DGs and offsite sources. c. RA A.3 cannot be applicable if RA B.4.2.2 is in effect since the RA A.3 second Completion Time only allows 14 days for the sequential inoperabilities of DGs and offsite sources, yet RA B.4.2.2 allows a DG to be inoperable for up

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Peach Bottom 2/3 CTS/ITS Section 3.8 Open Items - Questions to Licensee

Tracking Number	ITS Section	CTS Section	Comment Resolution Category	Description	Comment
Question 8	LCO 3.8.1 RA 8.4.2.1	TCSR No. 93-24	6	(With the Conowingo tie-line available PBAPS proposes (RA B.4.2.2) to allow a requireC DG to be inoperable for up to 30 days (<u>PBAPS TSCR No. 93-24</u>).) P <u>4</u> - Allows up to 7 days to verify availability of tie-line.	 Concerns: By allowing seven days to verify the availability of Conowingo tie-line after a DG becomes inoperable, hurried action to initiate plant shutdown may occur if the tie-line is not available. Periodic verification of tie-line is not included as a RA during the 30 days that a DG is allowed to be inoperable with the tie-line availability should be verified every 24 hours to avoid exceeding the time allowed for an inoperable DG (seven days) with the tie-line not available (RA B.4.1). In the <u>PBAPS ISCR No. 93-24</u> submittal the licensee committed to include a monthly verification of the Conowingo tie-line Operability in the TS. This requirement is not included in the proposed ITS.
Question 9	LCO 3.8.1.c and .d	None	6	P <u>1</u> 1, Insert 3.8.1 - The licensee proposes to add LCO requirements for the Unit 3 offsite circuits (LCO 3.8.1.c) and DGs (LCO 3.8.1.d) required to support equipment required by Unit 2. No Conditions and RAs are provided for the LCO Unit 3 offsite circuit or DG requirements.	Concern: What is the purpose of adding LCO 3.8.1 statements c. and d., since there are no specific Conditions, Required Actions, and Completions Times for these LCO requirements? The definition of Operable-Operability would require the two offsite circuits and the four DGs be capable of supplying AC power to all (Unit 2 and 3) distribution subsystems required by Unit 2 in Modes 1. 2. 3, 4, and 5. This addition is not in agreement with the NUREG-1433 format.

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Peach Bottom 2/3 CTS/ITS Section 3.8 Open Items - Questions to Licensee

Tracking Number	ITS Section	CTS Section	Comment Resolution Category	Description	Comment
Question 10	LCO 3.8.1 SR 3.8.1.8 SR 3.8.1.11 SR 3.8.1.16 SR 3.8.1.18 SR 3.8.1.19	None	6	Current TS markup discussion LCO $3.8.1 \text{ M}_3$ states that certain SRs are modified by a Note that states these SRs shall not be performed if the associated unit is in specific Modes.	Concern: No change was made in NUREG note to state that the Mode of the DG associated Unit determined if the SR could be performed. As presently stated the Note restriction is confusing. The NUREG Note should include Unit 3 Mode restrictions for Unit 3 DGs SRs or "if the associated unit is in" should be a added to Note for SRs.

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Peach Bottom 2/3 CTS/ITS Section 3.8 Open Items - Questions to Licensee

Tracking Number	ITS Section	CTS Section	Comment Resolution Category	Description	Comment
Question 11	LCO 3.8.7 Condition A Condition B	None	6	P ₁₈ P ₂₀ - The ITS, "Insert LCO 3.8.7," includes new LCO requirements for Unit 3 AC and DC distribution subsystems to support Unit 2. The associated Conditions A/B ("Insert A/B") includes longer Completion Times (7 days and 12 hours for Unit 3 versus 8 and 2 hours respectively for Unit 2) for the restoration of inoperable Unit 3 AC and DC distribution subsystems than Unit 2 (Conditions C/D).	Concerns: a. LCO 3.8.7, "Insert A/B", allows extended Completion Times for restoration of inoperable Unit 3 AC and DC distibution subsystem versus what is allowed for Unit 2. The NUREG discussion P ₂₀ state that the proposed Completion Times are based on the restoration time allowed for the supported components affected by the Unit 3 AC and DC distribution subsystems. However, although the restoration times may be based on the restoration times of the supported components, the supported component often require supplementory RAs during the time the component/system is inoperable (i.e. DGs and offsite circuits). What consideration has been given for these actions which are not required in the ITS when Unit 3 AC and DC distribution subsystems are inoperable? There is confusion on what LCOs/systems /components are supported by the Unit 3 AC and DC distribution subsystems. The LCO 3.8.7 statement ("Insert 3.8.7") includes a listing of 10 Unit 2 LCOs supported by the Unit 3 AC and DC distribution subsystems. Included in this list is LCO 3.8.5.1, "ECCS-Operating." The ITS proposed LCO 3.8.1 statements ("insert 3.8.1") for Unit 3 offsite circuits (c.) and DGs (d.) only lists three LCOs (3.5.4.3, 3.7.3, and 3.8.4) supported by Unit 3 AC sources. Also, the bases discussion for DC sources states that the Unit 3 DC subsystems only provided control power for DGs and 4 kV buses. <u>Clarification is</u>

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Peach Bottom 2/3 CTS/ITS Section 3.8 Open Items - Questions to Licensee

Tracking Number	ITS Section	CTS Section	Comment Resolution Category	Description	Comment
Question 11 (continued)	LCO 3.8.7	None	6	P ₁₉ Insert LCO 3.8.7 - The ITS includes new LCO requirements for Unit 3 AC and DC distribution subsystems to support Unit 2. The proposed statement includes a list of LCOs supported by the Unit 3 AC and DC distribution Subsystems. Similar listing in included in "Insert LCO 3.8.1" for Unit 3 AC sources.	b. Both ITS NUREG "Insert LCO 3.8.1" (P ₁₁) and "Insert LCO 3.8.7 (P ₁₉) included a list of Unit 2 LCOs supported by the Unit 3 AC sources and AC/DC distribution systems. The "cross references" are being eliminated from the CTS in other LCOs. The "cross references" of LCOs/components supported by a LCO should be Relocated from ITS.
Question 12	LCU 3.8.7	None	6	P ₁₀ "Insert LCO 3.8.7" and P ₂₀ "Insert A/B" - The ITS includes new LCO requirements and for Unit 3 AC and DC distribution subsystems to support Unit 2. Condition A and B include requirements for Unit 3 AC and DC distribution subsystems. However, neither Condition A or B includes a second Completion Times for the failure to meet the LCO. In addition, the Unit 3 subsystems are not included in the second Completion Times for the Unit 2 AC (Condition C) or DC (Condition D) distribution systems.	Concerns: Without second Completion Times there will be no maximum time allowed for any combination of required Unit 2 and Unit 3 distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. Thus the assumptions, regarding allowed out of service times for distribution subsystems as a result of sequential inoperabilities of distribution subsystems, may be exceeded.

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Peach Bottom 2/3 CTS/ITS SECTION 3.8 Open Items - NUREG Changes

Iracking Number	ITS Section	CTS Section	Comment Resolution Category	Description	Comment
NRC RL 1	SR 3.8.3.6	4.9.A.1 .2.j	6	R ₂ - Relocation of the requirement to drain, remove sediment, and clean each fuel oil tank every ten years from CTS and ITS.	The Relocation is not consistent with NUREG-1433 or CTS. Licensee states that the SR is maintenance requirement and not appropriate in the TS. Inclusion in plant procedures controlled by 10 CFR 50.59 will insure the completion of surveillance
NRC LR 1	SR 3.8.1.7, 3.8.1.12, and 3.8.1.14	4.9.A.1 .2.b	6	NUREG-1433 markup discussion P_{2e} and P_{2e} - CTS M_{17} The ITS has changed the voltage and frequency requirements for SRs that require a DG start without automatic loading. These SRs will only require lower voltage and frequency limits to be met within the associated time limits. Other maximum and minimum voltage and frequency limits will be required after the DG has reached "steady state."	Is it acceptable to the NRC that DGs only have to meet minimum voltage/frequency requirements within the specified time (seconds) during "start test" SRs and other minimum and maximum limits will be required when the DG has reached "steady state?"

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Peach Bottom 2/3 CTS/ITS SECTION 3.8 Open Items - NUREG Changes

Tracking Number	ITS Section	CTS Section	Comment Resolution Category	Description	Comment
NRC LR 2	SR 3.8.4.1		6	Current TS L, discussion for SR 3.8.4.1 - The improved TS SR 3.8.4.1, Frequency Note, allows the seven day battery terminal voltage verification requirements to be omitted if the battery has been on equalizing charge the previous 1 day. A second Frequency requires the verification to be completed within 14 days. This change is not consistent with CTS or NUREG-1433.	Is the allowance to omit the seven day battery terminal voltage verification requirements if the battery has been on equalizing charge the previous I day acceptable to the NRC?
NRC LR 3	SR 3.8.6.1	None	6	Current TS markup discussion L ₄ and NUREG markup for improved TS SR 3.8.6.1 - The improved TS SR 3.8.6.1 Frequency Note allows the seven day Category A verification to be omitted if the battery has been on equalizing charge the previous four days. A second Frequency requires the verification to be completed within 14 days. This change is not in NUREG-1433.	Is the allowance to omit the seven day Category A battery SRs acceptable to the NRC?

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Peach Bottom 2/3 CTS/ITS SECTION 3.8 Open Items - NUREG Changes

Tracking Number	175 Section	CTS Section	Comment Resolution Category	Description	Comment
NRC MR 1	LCO 3.8.1 RA A.3 COMPLETION TIMES	3.9.8.1	6	Current TS markup discussion La and NURE6 markup for LCO 3.8.1, RA A.3, COMPLETION TIMES - NUREG-1433 LCO 3.8.1, RA A.3, includes a non-bracketed "72 hours" and "6 days" COMPLETION TIME to restore an inoperable offsite circuit to Operable status. The licensee current TS 3.9.8.1 allows 7 days. The ITS proposes 7 (and 14 days) respectively to restore an inoperable offsite circuit to Operable status.	Are the proposed non-bracketed Completion Time changes acceptable to the NRC?
NRC MR 2	LCO 3.8.1 RA B.4.1 COMPLETION TIMES	3.9.8.1	6	Current TS 3.9.B.1 and improved TS LCO 3.8.1, RA B.4.1 - NUREG markup discussion P _a - NUREG-1433 LCO 3.8.1 RA B.4.1, includes a non-bracketed "72 hours" and "6 days" CLMPLETION TIME to restore an ino_stable DG to Operable status. The licensee current TS 3.9.B.1 allows 7 days. The ITS proposes 7 (and 14 days) respectively to restore an inoperable DG to Operable status.	Are the proposed non-bracketed Completion Time changes acceptable to the NRC?

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E.W. ROBERTS 1 of 4

PBAS OUESTIONS - IMPROVED TS SECTION 3.8

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Question 1 Reference: Current TS markup discussion R2 for improved TS 3.8.1

- a. Does the propose relocation of design and testing related details for the 480 V emergency load center timers and the 4 kV bus sequential loading relays (SV) include the Frequency of calibration?
- b. Since the "480 V Emergency Load Center Timers" and the "4 kV Emergency Bus Sequential Loading Relays (SV)" are critical to the emergency loads with and without offsite power, why are the requirements for testing (calibration) not included in improved TS 3.3.8.1, "Loss of Power Instrumentation?"
- Question 2 Reference: Current TS markup discussion R2 for improved TS LCO 3.8.4
 - a. Will the current TS specifications 3.5.F and 3.9.B.3 (3.9.B.5 statement) Actions (inoperable battery), which are related to the ECCS and the DG System, be included with procedures developed from the Safety Function Determination Program?
 - b. Will the procedures be controlled by 10 CFR 50.59.
- Question 3 Reference: NUREG-1433 markup discussion P28 and P29 for SRs 3.8.1.7, 3.8.1.12, and 3.8.1.14
 - a. What is the definition of "steady state?"
 - b. What is the time required to reach "steady state?"
- Question 4 Reference: Current TS markup discussion L, for improved TS LCO 3.8.3, Condition E, and the NUREG-1433 markup for LCO 3.8.3, Condition E.

The NUREG-1433 markup for LCO 3.8.3, Condition E, requires an DG start air receiver pressure <225 and \geq 150 psig. Current TS SR 4.9.A.1.2.a.6 requires the starting air to be \geq 225 psig. No justification has been provided for the reduction in air receiver pressure requirements in the improved TS markup discussion L₁.

Provide the justification for reducing the TS requirement for DG start air receiver pressure from ≥ 225 psig to ≤ 225 and ≥ 150 psig.

PBAS QUESTIONS - IMPROVED TS SECTION 3.8 E.W. ROBERTS 2 of 4

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Question 5 Reference: Current TS markup discussion L for improved TS 3.8.4, Condition A (Unit 3 DC sources) and Condition C (Unit 2 On what basis (safety analyses) are the Unit 3 DC electrical power subsystems required by Unit 2 allowed to be inoperable longer than the Unit 2 DC electrical power subsystems (12 hours for Unit 3 and 2 hours for Unit 2)? Are the 4 kV load/feeder breakers for one 4 kV emergency bus in Unit 6. 2 and one of four DGs without control power during the seven days that one Unit 3 battery subsystem is allowed by LCO 3.8.4, RA A.1, to inoperable for SR 3.8.4.7 or 3.8.4.8? If not, is the source of control power from an independent qualified DC source? What is the source of control power for the Unit 3 AC emergency C. Open pending explanation and discussion with licensees on Unit 3 DC battery subsystems. Question 6 Reference: NUREG markup for LCO 3.8.1, RA A.3, second COMPLETION Why are the Unit 3 offsite circuits (LCO 3.8.1 c.) not included in the Condition A (RA A.3) second COMPLETION TIME? Why is there no separate Condition for the Unit 3 offsite circuits? 6. Why doesn't RA B.4.1 have a required action Note stating that it is C. only applicable when the Conowingo Tie-Line is not Operable? Why is there no second COMPLETION TIME for improved TS LCO 3.8.1, RA d. B.4.2.2, that includes all Unit 2 and Unit 3 AC sources? Question 7 Reference: NUREG markup for LCO 3.8.1, RA B.4.1, second COMPLETION Why are the Unit 3 offsite circuits (LCO 3.8.1 c.) not included in Why is there no second COMPLETION TIME for improved TS LCO 3.8.1, RA B.4.2.2, that includes all Unit 2 and Unit 3 AC sources?

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E.W. ROBERTS 2 of 4

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PBAS QUESTIONS - IMPROVED TS SECTION 3.8

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- Question 5 Reference: Current TS markup discussion L₆ for improved TS 3.8.4, Condition A (Unit 3 DC sources) and Condition C (Unit 2 DC sources) and the NUREG markup.
 - a. On what basis (safety analyses) are the Unit 3 DC electrical power subsystems required by Unit 2 allowed to be inoperable longer than the Unit 2 DC electrical power subsystems (12 hours for Unit 3 and 2 hours for Unit 2)?
 - b. Are the 4 kV load/feeder breakers for one 4 kV emergency bus in Unit 2 and one of four DGs without control power during the seven days that one Unit 3 battery subsystem is allowed by LCO 3.8.4, RA A.1, to inoperable for SR 3.8.4.7 or 3.8.4.8? If not, is the source of control power from an independent qualified DC source?
 - c. What is the source of control power for the Unit 3 AC emergency loads required by Unit 2?

Open pending explanation and discussion with licensees on Unit 3 DC battery subsystems.

- Question 6 Reference: NUREG markup for LCO 3.8.1, RA A.3, second COMPLETION TIME
 - a. Why are the Unit 3 offsite circuits (LCO 3.8.1 c.) not included in the Condition A (RA A.3) second COMPLETION TIME?
 - b. Why is there no separate Condition for the Unit 3 offsite circuits?
 - c. Why doesn't RA B.4.1 have a required action Note stating that it is only applicable when the Conowingo Tie-Line is not Operable?
 - d. Why is there no second COMPLETION TIME for improved TS LCO 3.8.1, RA B.4.2.2, that includes all Unit 2 and Unit 3 AC sources?
- Question 7 Reference: NUREG markup for LCO 3.8.1, RA B.4.1, second COMPLETION TIME and RA B.4.2.2
 - a. Why are the Unit 3 offsite circuits (LCO 3.8.1 c.) not included in the Condition A (RA A.3) second COMPLETION TIME?
 - b. Why is there no second COMPLETION TIME for improved TS LCO 3.8.1, RA B.4.2.2, that includes all Unit 2 and Unit 3 AC sources?

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5.3 *

PBAS QUESTIONS - IMPROVED TS SECTION 3.8

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Question 8 Reference: NUREG discussion P, for improved TS LCO 3.8.1, RA B.4.2.1

- a. On what basis can improved TS B.4.2.1 allow up seven days to verify correct breaker alignment and indicated power from the Conowingo Tie-Line when a DG becomes inoperable; since the DG is only allowed to be inoperable up to seven days with the Tie-Line unavailable?
- b. Why isn't periodic verification of the Conowingo Tie-Line availability requiredduring the 35 days that a DG is allowed to be out of service?
- c. In TSCR No. 93-24 BPAPS proposed to add a TS SR requiring the monthly verification the Conowingo Tie-Line Operable. Why wasn't the proposed SR included in the improved TS?
- Question 9 Reference NUREG markup discussion P₁₁ (Insert LCO 3.8.1) for LCO 3.8.1 (c. and d.)

What is the purposed of adding LCO 3.8.1 statements c. and d., since there are no specific Conditions, Required Actions, and Completions Times for these LCO requirements? The definition of Operable-Operability would required the two offsite circuits and the four DGs be capable of supplying AC power to all (Unit 2 and 3) distribution subsystems required by Unit 2 in Modes 1. 2. 3, 4, and 5. This addition is not in agreement with the NUREG-1433 format.

Question 10 Reference: Current TS markup discussion LCO 3.8.1 Mg

Current TS markup discussion LCO 3.8.1 M₃ states that certain SRs are modified by a Note that states these SRs shall not be performed for SRs 3.8.1.8/.11/.16/.18/.19 is not consistent with the current TS M₃ discussion, since the they do not include any reference to the operating Mode of Unit 3 in the Note restrictions.

Provide correct NUREG markup or revised discussion of change.

Question 11 Reference: (M2) discussion for improved TS 3.8.7, Condition A and B

a. On what basis (safety analyses) are the Unit 3 AC and DC distribution subsystems required by Unit 2 allowed to be inoperable longer than the Unit 2 AC and DC distribution subsystems (7 days and 12 hours for Unit 3 versus 8 and 2 hours respectively for Unit 2)?

E.W. ROBERTS 4 of 4

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PBAS QUESTIONS - IMPROVED TS SECTION 3.8

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Reference: Insert LCO 3.8.7, NUREG markup discussion P10

- b. The listing of specific LCOs for which Unit 3 AC and DC distribution subsystems are required to support is in disagreement with one of NUREG-1433 objectives. This type of information was intended to be located within the Bases and plant procedures. Why is this material necessary in the improved TS?
- Question 12 Reference: NUREG-1433 markup discussion P₂₀ for LCO 3.8.7, RA C.1 and RA D.1, COMPLETION TIME
 - a. Why does the second Completion Times for Unit 2 AC (RA C.1) and DC (RA D.1 not apply to LCO 3.8.7 b. (Unit 3 AC and DC distribution subsystems)?
 - b. Why are no second Completion Times included in the Unit 3 LCO 3.8.7, RA A.1 and B.1?

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RESPONSES TO NRC COMMENTS (3.8)

Existing Specification 4.2.B (Table 4.2.B) Question la. requires an Instrument Functional Test of the 4 kV Emergency Power System Voltage Relays (SV), which provide a permissive for the individual load timers associated with each 4 kV emergency bus, once per operating cycle. Existing Specification 4.2.B (Table 4.2.B) also requires a Calibration of the 480 V Emergency Load Center Timers once per operating cycle (24 months). A Calibration of the 4 kV Emergency Power System Voltage Relays (SV) is also required once per 5 years per existing Specification 4.2.B (Table 4.2.B). A Calibration of these relays/timers will be performed by proposed SR 3.8.1.18 (once per 24 months) when the sequencing interval between the loads is verified. The Functional Test of the 4 kV Emergency Power System Voltage Relays (SV) is being relocated to the procedures which perform SR 3.8.1.11, SR 3.8.1.12, and SR 3.8.1.19 because successful completion of any of these SRs constitutes a Functional Test of these relays.

- Question 1b. The requirements for the relays/timers discussed in 1a. above were not included in the ITS 3.3.8.1, "Loss of Power Instrumentation," since, historically in the old STS as well as in the ITS, relays associated with sequencing of loads have been included in the AC Sources Specifications. In NUREG-1433, Specification 3.3.8.1, "Loss of Power Instrumentation," addresses bus transfers and diesel generator start functions associated with loss of voltage and degraded voltage conditions. As a result, including relays/timers associated with load sequencing in Specification 3.3.8.1 is inconsistent with NUREG-1433.
- Question 2a. The requirements in current Technical Specifications 3.9.B.3 which tie the Actions of the DC Sources with the ECCS and diesel generators (DGs) will be included in the implementing procedures of the Safety Function Determination Program (SFDP).
- Question 2b. As described in the No Significant Hazards Consideration for R, for ITS 3.8.4, the requirement in the SFDP implementing procedures will be controlled by 10CFR50.59.

Enclosure 5

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Question 3a. The definition of "steady state" as used in SRs 3.8.1.7, 3.8.1.12, and 3.8.1.15 is when the DG starting transient has subsided and voltage and frequency have stabilized (not oscillating).

On a DG start without automatic loading, DG Question 3b. governors will normally operate to achieve steady state conditions in 20 to 30 seconds. The time period for reaching steady state condition is shorter under actual loss of off site power conditions. Under actual loss of off site power conditions, the DG would be immediately loaded once minimum speed and voltage requirements were met, thereby limiting overshoot and reducing the time required to achieve steady state conditions. The time period for achieving steady state conditions has not been included in the Technical Specifications since other Technical Specification Surveillance Requirements (load rejection 'ests and load sequencing tests) are adequate to assure DG governor Operability is maintained.

- Question 4 PBAPS ITS SR 3.8.3.4 requires DG air receiver pressure to be ≥ 225 psig. This pressure is sufficient for five successive start attempts. As stated in Discussion of Change L, for ITS 3.8.3, Specification 3.8.3, Condition E, allows 48 hours to restore air receiver pressure to the pressure necessary for five successive DG start attempts. However, this allowance is only provided if the air receiver pressure is sufficient for one DG start attempt. For the PBAPS DGs, the air receiver pressure value necessary for one DG start attempt is 150 psig.
- Question 5a. The basis for providing a longer Allowed Outage Time (AOT) for the opposite unit's DC electrical power subsystem (12 hours) than for the subject unit's DC electrical power subsystem (2 hours) is as follows:

The loss of the opposite unit's DC electrical power subsystem results in inoperabilities similar to that which would result from the loss of one DG and one offsite source in the STS. Therefore, a 12 hour AOT for an inoperable opposite unit's DC electrical

Question 5a. (continued)

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power subsystem has been provided consistent with the AOT in NUREG-1433 Specification 3.8.1, "AC Sources-Operating," for one DG and one offsite circuit inoperable. In addition, the current Technical Specifications (3.9.B.5) provides a 3 day AOT for the loss of an opposite unit's DC electrical power subsystem. 2004

During the 7 days that an opposite unit's DC Question 5b. electrical power system is inoperable for the performance of SR 3.8.4.7 (Battery service test) or SR 3.8.4.8 (Battery performance discharge test), the components powered from the opposite unit's DC electrical power system are inoperable. For example, on Unit 2 if the Unit 3 Division IC battery bank or the Division IID battery bank is being tested per SR 3.8.4.7 or SR 3.8.4.8, then the source of control power for the associated DG and 4 kV load feeder breakers are inoperable. The 7 day AOT is based on the time required to perform the required battery testing and return the battery to Operable status. No other independent qualified DC sources are available to provide control power for the associated DG and 4 kV load feeder breakers. However, without this allowance PBAPS would be required to schedule dual unit shutdowns to perform the tests. The note to Required Action A.1 of Specification 3.8.4 ensures that during the performance of the test the associated 4 kV emergency bus or DC buses are not deenergized. If the associated buses do become deenergized then the Required Actions of Specifications 3.8.7 are applicable which requires the associated buses to be reenergized in accordance with the Completion Times of Conditions A and B, as applicable.

Question 5c. The source of control power for Unit 3 AC emergency loads required by Unit 2 are as follows:

> Unit 3 Division IC battery bank provides control power for the E3 DG, the E32 4 kV bus, the E33 4 kV bus, and associated 4 kV loads of the buses.

> Unit 3 Division IID battery bank provides control power for the E4 DG, the E42 4 kV bus, the E43 4 kV bus, and associated 4 kV loads of the buses.

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Further explanation of the PBAPS DC electrical power subsystems will be provided during the ITS Section 3.8 meeting between PECO Energy and the NRC.

Question 6a. The maximum time limit for noncompliance with the LCO (second Completion Time) has not been included for opposite unit components (offsite circuits, DGs, AC and DC power distribution subsystems) required by the subject unit since doing so would make the maximum time limit inappropriately long. In addition with both units at power, the opposite unit's Technical Specifications do include a maximum time limit for these components (offsite circuits, DGs, AC and DC power distribution subsystems). As a result, it was concluded that adding an appropriate maximum time limit for the opposite unit's component would add complexity with little or no enhancement to safety.

- Question 5b. No separate Condition is needed for the opposite unit's offsite circuits required by the subject unit. The 7 day AOT provided for one offsite circuit inoperable is adequate for performance of the required testing and maintenance of the opposite unit's offsite circuits without requiring a dual unit shutdown.
- Question 6c. Required Action B.4.1 does not have a note stating it is only applicable when the Conowingo Tie-Line is inoperable since it is not needed. The use of the logical connector "QB" (as described in Section 1.2, "Logical Connectors") between B.4.1 and B.4.2.1 ensures that the appropriate Required Actions will be applied. In addition, the Writer's Guide states that the use of notes should be minimized.
- Question 6d. The maximum time limit for noncompliance with the LCO (second Completion Time) has not been included for the 30 day AOT associated with an inoperable DG since doing so would make the maximum time limit inappropriately long. In addition, this portion of the PBAPS ITS was developed from Technical Specification Change Request (TSCR) 93-24 which did not establish a maximum time limit for the 30 day AOT associated with an inoperable DG.

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Question 7a.

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The maximum time limit for noncompliance with the LCO (second Completion Time) has not been included for opposite unit components (offsite circuits, DGs, AC and DC power distribution subsystems) required by the subject unit since doing so would make the maximum time limit inappropriately long. In addition with both units at power, the opposite unit's Technical Specifications do include a maximum time limit for these components (offsite circuits, DGs, AC and DC power distribution subsystems). As a result, it was concluded that adding an appropriate maximum time limit for the opposite unit's component would add complexity with little or no enhancement to safety.

- Question 7b. The maximum time limit for noncompliance with the LCO (second Completion Time) has not been included for the 30 day AOT associated with an inoperable DG since doing so would make maximum time limit inappropriately long. In addition, this portion of the PBAPS ITS was developed from Technical Specification Change Request (TSCR) 93-24 which did not establish a maximum time limit for the 30 day AOT associated with an inoperable DG.
- Question Sa. This answer is being provided for your information and we expect that issues with the Conowingo Tie Line will be resolved outside of ITS.

Condition B of Specification 3.8.1 will be entered whenever a DG is declared inoperable. The Required Action B.4.1, will be completed or both Required Action Statements B.4.2.1 and B.4.2.2 will be completed any time an DG is declared inoperable. Thus, if required action B.4.2.1, is not completed within 7 days Required Action B.4.1, would prevail, and in accordance with the Required Actions of Condition F the Unit would be in placed in Mode 3 within 12 hours, and Mode 4 within 36 hours. For scheduling and operation concerns PBAPS would want to know the allowable duration of any DG outage, and would perform Required Action B.4.2.1 shortly after a DG was declared inoperable.

Question 8b. Periodic verification of Conowingo Tie-Line Operability during the 30 days that a DG is inoperable has not been provided in the PBAPS ITS consistent with TSCR 93-24. TSCR 93-24 only requires verifying Conowingo Tie-Line Operability

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once per month. No periodic verification during the 30 day DG AOT is required by TSCR 93-24 because the scenario where the Conowingo Tie-Line becomes inoperable some time after 7 days (i.e., on day 8 of a DG outage, the Conowing's Tie-Line becomes inoperable) is considered unlikely because of the inherent stability of design. The Conowingo Tie-Line was installed to address a Station Blackout (SBO), accordingly the line is resistant to weather induced failures. The line is powered from the Pennsylvania, Jersey, Maryland electrical grid with the Conowingo Hydro-Electric Station serving as a black start for the line. These features make failure unlikely and any failure would be easily detected. The line is continually energized, includes control room trouble alarms, and is used as the power source for the PBAPS training facility. Further, station procedures include daily communications with the Conowingo Hydro-Electric Station Control Room.

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Question Sc. The monthly verification of Conowingo Tie-Line Operability has not been included in the PBAPS ITS since this verification is related to Station Blackout requirements. At this time, the NRC and the Industry have not agreed that Station Blackout requirements should be included in the Technical Specifications. However, since PBAPS is crediting the Conowingo Tie-Line to allow extension of a DG AOT, the same type verification of Conowingo Tie-Line Operability has been included in Required Action B.4.2.1. This Required Action must be performed prior to extending the DG AOT from 7 days to 30 days.

LCO 3.8.1 statements c. and d. were added for Question 9 clarity for the operators due to the complexity of the PBAPS electrical design. In addition, the ITS definition of OPERABLE-OPERABILITY does not require all Unit 2 and 3 components required by Unit 2 to be capable of being powered from normal and emergency power sources. The ITS definition of OPERABLE-OPERABILITY would allow opposite unit components required by the subject unit to be considered OPERABLE if they are capable of being powered from normal or emergency power. As a result, both onsite and offsite power for the opposite unit's components would not be required (unless explicitly stated in LCO 3.8.1). It is correct that the addition of LCO is not in

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RESPONSES TO NRC COMMENTS (3.8)

agreement with NUREG-1433. However, it should be recognized that NUREG-1433 was written for a single unit (Hatch Unit 2) and ignored, for the most part, the shared systems between units (Hatch Unit 1 and Hatch Unit 2) at multi-unit sites. As a result, NUREG-1433 does not adequately address the licensing/design basis for shared systems between units at a multi-unit site.

- Question 10 The NUREG markup for the Notes to SRs 3.8.1.8, 3.8.1.11, 3.8.1.16, 3.8.1.18, and 3.8.1.19 are consistent with the Discussion of Change M₃ for ITS 3.8.1. Only one markup of the NUREG was done. It applies to both Units 2 and 3. The NUREG markup is not unit specific unless annotated as such. The Notes to SRs 3.8.1.8, 3.8.1.11, 3.8.1.16, 3.8.1.18, and 3.8.1.19 are the same in both the Unit 2 and the Unit 3 ITS.
- Question 11a. The 7 day AOT for the opposite unit's AC distribution subsystem required by the subject unit is based on the shortest AOT allowed for systems affected by the inoperable AC distribution subsystem.

The 12 hour AOT for the opposite unit's DC distribution subsystem required by the subject unit is based on the AOT for an opposite unit's DC electrical power subsystem required by the subject unit. The basis for the AOT for the opposite unit's DC electrical power subsystem required by the subject unit is as follows:

> The loss of the opposite unit's DC electrical power subsystem results in inoperabilities similar to that which would result from the loss of one DG and one offsite cource in the STS. Therefore, a 12 hour AOT for an inoperable opposite unit's DC electrical power subsystem has been provided consistent with the AOT in NUREG-1433 Specification 3.8.1, "AC Sources-Operating," for one DG and one offsite circuit inoperable. In addition, the current Technical Specifications (3.9.B.5) provides a 3 day AOT for the loss of an opposite unit's DC electrical power subsystem.

Question 11b. The listing of the specific LCOs which the opposite unit's AC and DC distribution subsystems

are required to support are provided in LCO 3.8.7 for clarity due to the complexity of the PBAPS electrical design and due to the fact that the opposite unit's AC and DC distribution subsystems required to be OPERABLE can vary depending on which components are OPERABLE.

Question 12a. and Question 12b.

The maximum time limit for noncompliance with the LCO (second Completion Time) has not been included for opposite unit components (offsite circuits, DGs, AC and DC power distribution subsystems) required by the subject unit since doing so would make the maximum time limit inappropriately long. In addition with both units at power, the opposite unit's Technical Specifications do include a maximum time limit for these components (offsite circuits, DGs, AC and DC power distribution subsystems). As a result, it was concluded that adding an appropriate maximum time limit for the opposite unit's component would add complexity with little or no enhancement to safety. Enclosure 6



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		E 33	E 32 %	1.5.E.42-4	E 13	E 23	E 33	C 4 3
UNIT 2	E 12	E 44				E3		E4
FDG	E1		E3			EK		20002
Battery	2AD03	2BD03	2CD03	20003			30003	conne
MSdH	MO 210089A &	MO 2100898 &	MO 210089C & HPSW Plump 2C	MO 210089D & HPSW Pump 2D				
ccial	HPSW Pump ZA	Pumps OAP57 &	Pumps 08P57 &					
EDVA		0AP163	08P163					AAD DAGR &
EC Tower			MO 2803		Fan B & MO 0501B & MO 0502B	MO 2486 Fan A & MO 0501A & MO 0502A		MO 0502C
HPCI	MO 223015	MO 223015						
50	Subsvs 2A & 2C	Subsys 2B & 2D	Subsys 2A & 2C	Subsys 2B & 2D				
BUIC		MO 213015						
LPCI	Subsys 2A	Subsys 28	Subsys 2C	Subsys 2D				
RHR (SDC)	Subsys 2A. 2B. 2C & 2D	Subsys 2B & 2D	Subsys 2A & 2C	Subsys 2B & 2D				
AND ICPCI	Subsvs 2A	Subsys 2B	Subsys 2A & 2C	Subsys 2B & 2D				
ISASI ANA	Subsvs 2A	Subsys 28	Subsys 2A & 2C	Subsys 28 & 2D				
CR HVAC			E Vent Fan A & Fresh Air Fan A & Rad Monitor Pump A	E Vent Fan B & Fresh Air Fan B & Rad Monitor Pump B				
COT	Fan A & Htr A	Fan B				Heater B		
CAD		Vaporizer A	Vaporizer B					
SLC	Subsys 2A	Subsys 2B						_

UNIT 3	E 12	E 22	E 32	E 42	ENS	EZS	E 33	5-49 ·
EDG	E1		E3	1		E2		E4
Battery Charger	2AD03	2BD03			3AD03	38D03	3CD03	3DD03
HPSW					MO 310089A & HPSW Pump 3A	MO 310089B & HPSW Pump 3B	MO 310089C & HPSW Pump 3C	MO 310089D & HPSW Pump 3D
ESW		Pumps OAP57 & OAP163	Pumps 0BP57 & 0BP163					
EC Tower					Fan B & MO 0501B & MO 0502B	MO 2486 Fan A & MO 0501A & MO 0502A		MO 0498 MO 3803 & Fan C & MO 0501C & MO 0502C
HPCI					MO 323015	MO 323015		
cs					Subsys 3A & 3C	Subsys 3B & 3D	Subsys 3A & 3C	Subsys 3B & 3D
RCIC						MO 313015		
I PCI					Subsys 3A	Subsys 3B	Subsys 3C	Subsys 3D
RHR (SDC)					Subsys 3A, 3B, 3C & 3D	Subsys 3B & 3D	Subsys 3A & 3C	Subsys 3B & 3D
RHR (SPC)					Subsys 3A	Subsys 3B	Subsys 3A & 3C	Subsys 3B & 3D
RHR (SPS)			1		Subsys 3A	Subsys 3B	Subsys 3A & 3C	Subsys 3B & 3D
CR HVAC			E Vent Fan A & Fresh Air Fan A & Red Monitor Pump A	E Vent Fan B & Fresh Air Fan B & Rad Monitor Pump B				
SGT	Heater A	Fan B				Heater B	Fan C	
CAD		Vaporizer A	Vaporizer B					
SLC		1 12 7 12 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			Subsys 3A	Subsys 3B		



July 8, 1994

Mr. Dan Green PECO Energy Company 955-65 Chesterbrook Blvd. Wayne, PA 19087-5691

Dear Mr. Green:

This is in answer to our telephone conversation on 7/12/94 regarding the subject of stratification as related to Yuasa-Exide, Incorporated (YEI) 2GN-23 cells at Peach Bottom Nuclear Power Station. The discussion centered on how stratification effects might warrant a change in your operating procedures regarding specific gravity (S.G.) readings and subsequent actions triggered by those readings.

Stratification of electrolyte in Fb-Ca type lead acid cells is a commonly known and accepted phenomena. This stratification can result in false "low" readings of electrolyte S.G. when taken in the top third of the cell compared to what the "fully mixed" S.G. of the cell actually is. Stratified electrolyte has been shown to not affect cell performance or life over short periods of time (up to about 6 months).

Stratification effects are most severe during the recharge period following a full discharge. It is common for Pb-Ca type lead acid cells to take at least 90 days and up to 180 days to reach a fully mixed (non-stratified) condition after such a discharge.

It is my understanding that the charging system at Peach Bottom is limited to a maximum of 200 amps compared to the charging system in other plants that use 2GN-23 cells where about 400 amps output is available. This fact can certainly add to the severity and elongation of stratification in cells at Peach Bottom since the lower charge amps would create less gas on charge; it is the volume of the gassing action on charge that most effectively mixes electrolyte and eliminates stratification.

> 645 Penn Street Reading, PA 19601 P.O. Box 14145 Reading, PA 19612-4145 610/371-0400

Mr. D. Green

- Page 2 -

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July 8, 1994

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Taking all of the above into account, it is YEI's recommendation that the exemption from specific gravity parameters at Peach Bottom be extended from 7 days to 180 days as long as pilot cell voltages are within specified values and the float current is at or below one (1) amp.

In addition, as an added level of assurance that the operability limits will be met at 180 days, we recommend modifying the performance monitoring of the cells as follows:

If readings taken at 90 days show any cell or cells below specified S.G. values, than those cells should be read on a monthly basis along with previously selected pilot cells. If monthly tracking of those cells over three readings show stabilized or increasing S.G., then no further action is required. If monthly readings of any of those cells show a decreasing S.G. trend, then those individual cells (or as an option the full battery) should be given an equalizing charge.

If, at 180 days any cells are still below specified S.G. values, then either the individual cell or the full battery should be given an equalizing charge.

The above assumes that cell voltages are within specified limits and float current is at or below one (1) amp at all readings.

I hope this will help to resolve your situation at Peach Bottom. Please call if you need to discuss further.

Sincerely,

Frank L. Tarantino

Frank L. Tarantino Director Product/Process Engineering

FLT/csm

cc: Mr. Gary Rubino - PECO Energy Company Mr. John Princevalli - Integrated Power Sources

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 TSCRs Submitted After 9/1/95 and Not Included in September 29, 1994 Submittal

TSCR No.	Date	Subject	ITS Section	Consistent with Proposed ITS
94-15	10/25/94	Revise HPCI Low pressure testing requirements to be consistent with proposed ITS	3.5.1	Yes
94-11 94-12 94-13	11/14/94	Relocate NRB audit topics and frequencies, NRB review description and ISEG requirements out of TS	5.0	Yes
93-13	11/17/94	Main Stack and Vent Stack radiation monitor upgrades	3.3.6.2	No
94-14	11/21/94	Unit 3, One-time deferral of ILRT	3.6	Yes
94-07	1/13/95	LPRM gain calibration frequency	3.3.1.1	No
94-08	1/13/95	TIP Enhancement Modification	3.6.1.1	No
93-18	1/17/95	Wide Range Neutron Monitoring	3.3, 3.6	No*
95-02	2/10/95	Correction of a 1975 administrative error on CREV filter testing	5.5.7.f	No
95-01		Allow exceeding 212°F during RPV hydro testing	3.10.1	Yes
94-18		SRM Mode 5 requirements	3.3.1.2	Yes
95-04		Reduce LLRT 1-hr hold time requirement to 20 minutes	3.6	Yes
93-22	`	Include description of offsite source enhancement modification in Bases description	3.8	Yes

* Modification will not be implemented until 1996 (Unit 2) and 1997 (Unit 3), after effective date of ITS.

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 TSCRs Approved by NRC After 9/1/95

TSCR No.	Date	Subject	ITS Section	Consistent with Proposed ITS
93-28	11/29/94	Various line item improvements recommended by GL 93-05 and Company name change	Various	Yes
94-01	9/16/94	Minimum ECCS requirements during shutdown	3.5.2	No*
94-05	9/30/94	Unit 2, One-time deferral of ILRT	3.6	Yes
94-06	9/30/94	Deferral of scram time testing to prior to exceeding 40% power	3.1.4	Yes
93-12	10/18/94	Unit 2, Power Rerate	Various	Yes

* NRC approved amendment different than what was proposed in PECO Energy's 5/10/94 original TSCR and what was proposed in 9/29/94 ITS submittal.

As of 3/3/95

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 Pending Revisions to 9/29/94 ITS Submittal

Subject	ITS Section
PASS	5.5.3
Add provisions for single loop operation and TBV out of service	3.2.1.3.2.2 3.4.1 3.7.6
Core Spray EDG start logic	3.3.5 (Bases only)
Various changes agreed to at 1/11/95 meeting with NRC to discuss 1.0, 3.0 and 4.0 (including LCR 3.0.5)	1.0 3.0
Average water temperature of normal heat sink from 95°F to 90°F	3.7.2

As of 3/3/95

PEACH BOTTOM IMPROVED TECHNICAL SPECIFICATIONS LICENSE AMENDMENT REVIEW SCHEDULE

March 4, 1995

1	T				IV	¥	VI	VII	VIII	IX
LEAD REVIEWER	TS SECTION	START REVIEW	COMPLETE ITS ASMIT (TASK 1)	PROVIDE RESULTS TO PECD	PECO MEETING IDENTIFY & ASSIGN ACTION ITEMS (TASK 2)	RESOLVE ACTION ITEKS	COMPLETE BRANCH LEVEL APPEAL (OTSB)	FINALIZE SE AUSTIFICATIONS (TASK 3)	PECO ISSUE PROOF & REVIEW TS	OTSB ISSUE CONVERSION SE
Gilles	Split Report 1.0, 3.0, 4.0	12/5/94	12/23/94	12/23/94	1/11/95	1/20/95	1/27/95	2/10/95	3/17/95	5/31/95
ALL	1.1 (Section specific)	concurrent w/ section reviews								5/31/95
Contractor (Alan Yudi)	3.3	12/14/94	1/20/95	1/24/95 [1/27/95]	2/2/95	2/17/95	2/24/95	3/10/95	3/24/95	5/31/95
Contractor (Wayne Roberts) Gilles	3.8	1/3/95	2/7/95 [1/27/95]	2/7/95 [2/3/95]	3/6/95 [2/17/95]	3/3/95	3/10/95	3/24/95	4/21/95	5/31/95
Contractor (John Hanek) Gilles	3.6, 3.7	12/18/94	2/7/95 [2/24/95]	2/13/95 [3/3/95]	3/17/95	3/31/95	4/7/95	4/21/95	5/19/95	5/31/95
Contractor (Roberts) (Hanek) Gilles	2.0, 3.2, 3.10 3.1 5.0, Env. TS	2/8/95	2/17/95 3/3/95 (3/24/95)	3/31/95	4/14/95	4/28/95	5/5/95	5/19/95	5/19/95	5/31/95
Contractor (Mark Parish) Gilles	3.4, 3.5, 3.9	2/27/95	4/14/95	4/21/95	5/5/95	5/12/95	5/19/95	5/19/95	5/19/95	5/31/95

TENTATIVE LOCATIONS AND DATES FOR SCHEDULED COLUMN IN MEETINGS

Location	-	PECO	2:	Date	÷	1/11/95	Location	ы. -	;	Date	-
Location	i.	NRC	:	Date	*	2/2/95	Location		;	Date	-
Location	*	NRC	1	Date	*	3/6/95	Location	*	;	Date	*
Location	÷		1	Date-	1						

Enclosure 8