



PECO ENERGY

10 CFR 50.91

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

September 1, 1995

Docket No. 50-278

License No. DPR-56

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Subject: Peach Bottom Atomic Power Station, Unit 3  
Exigent License Change Request No. 95-07

Dear Sir:

PECO Energy Company hereby submits Exigent License Change Request No. 95-07, in accordance with 10 CFR 50.91, requesting a change to the Peach Bottom Atomic Power Station, Unit 3 Facility Operating License. The proposed changes involves the deletion of License Condition 2.C(5). This condition was also the subject of a request for Enforcement Discretion (ED) submitted to the NRC on August 30, 1995.

As discussed in the August 30, 1995 letter, PECO Energy identified on August 29, 1995 that the PBAPS, Unit 3 was operating outside the FOL. License Condition 2.C(5) restricts power levels to no less than 70% in the coastdown condition. At the time of discovery, PBAPS, Unit 3 was operating at approximately 62%. In order to avoid an unnecessary plant shutdown, a request for ED was submitted to cover the period until such time that a followup license change request could be submitted. We request that the proposed change be made effective upon issuance.

Attachment 1 to this letter describes the proposed change, and provides justification for the change. Attachment 2 contains the revised Facility Operating License page.

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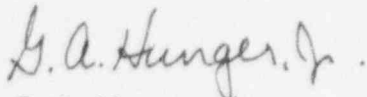
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If you have any questions concerning this matter, please do not hesitate to contact us.

Very truly yours,



G. A. Hunger, Jr.,  
Director - Licensing

Enclosures: Affidavit, Attachment 1, Attachment 2

cc: T. T. Martin, Administrator, Region I, USNRC  
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS  
R. R. Janati, Commonwealth of Pennsylvania

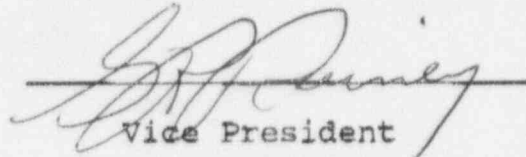
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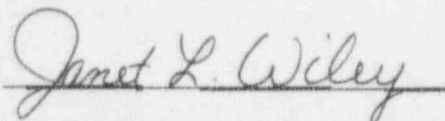
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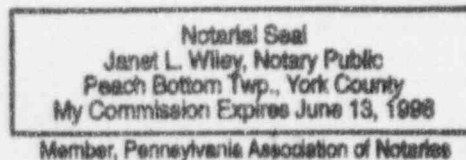
G. R. Rainey, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company; the Applicant herein; that he has read the attached License Change Request (Number 95-07) for Peach Bottom Facility Operating License 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 31st day  
of August, 1995.

  
Notary Public



ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION  
UNIT 3

Docket No. 50-278  
License No. DPR-56

EXIGENT LICENSE CHANGE REQUEST  
95-07

"Deletion of Facility Operating License Condition 2.C(5)"

Supporting Information - 4 Pages

## Introduction

PECO Energy Company (PECO Energy), Licensee under Facility Operating License DPR-56 for the Peach Bottom Atomic Power Station (PBAPS), Unit 3, requests that the Facility Operating License No. DPR-56 be amended. The proposed change involves the deletion of License Condition 2.C(5) from the Facility Operating License (FOL). The proposed change is shown in Attachment 2 for the PBAPS, Unit 3 FOL. Due to the urgency of this issue, we request that this change be made effective upon issuance.

This license change request provides a discussion and description of the proposed FOL change, a safety discussion of the proposed FOL change, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

## Discussion

The proposed change involves the deletion of License Condition 2.C(5). License Condition 2.C(5) states: "Operation beyond the end-of-cycle (all rods out condition) thermal power is limited to seventy (70) percent minimum. Increasing core power level via reduced feedwater heating, once operation in the coastdown mode has begun, is not permitted unless the licensee has performed an analysis of this operating condition that confirms that this condition is bounded by the analysis for the particular cycle of operation."

This condition was incorporated in the PBAPS, Unit 3 FOL as a part of License Amendment No 62, dated October 24, 1979. The NRC stated in the NRC Safety Evaluation Report (SER) for Amendment No. 62, that the 70% coastdown core power level was the limit of the NRC acceptance of the core reload safety analyses. This condition was included as a license condition to the PBAPS, Unit 3 FOL. As also discussed in License Amendment No. 62, an additional requirement was added to License Condition 2.C(5) which restricts the increasing of core power by reducing feedwater heating in coastdown unless an analysis was performed that bounds the condition for the particular cycle of operation.

The 70% limit was revised as discussed in the Supplemental Reload Licensing Report for PBAPS, Unit 3 Reload 9 Cycle 10, Revision 0, GE Document No. 23A7215, dated October 1993. This reload report allowed coastdown operation beyond full power capability to as low as 40% power under conditions bounded by 110% core flow. The reload licensing report was submitted to the NRC, by reference, in the Core Operating Limits Report (COLR) for PBAPS, Unit 3, Cycle 10 in a letter dated November 19, 1993. The basis for the methodology utilized in this reload is provided in "General Electric Standard Application for Reactor Fuel," NEDE-24011-P-A-10, February 1991.

Although the 70% limit was initially included as a licensing condition in the FOL, it has been determined that this limit is more appropriately located in other licensing basis documents which include the NRC approved GESTAR II analyses and the cycle

specific reload licensing reports, and should not be part of the FOL. This approach is consistent with the guidance of Generic Letter 88-16, "Removal of Cycle-Specific Parameter Limits From Technical Specifications."

Also included in this license condition is the stipulation that increasing core power level via reduced feedwater heating, once operation in the coastdown mode has begun, is not permitted unless the licensee has performed an analysis of this operating condition that confirms that this condition is bounded by the analysis for the particular cycle of operation. The need to perform this analysis is more appropriately discussed in each cycle specific reload licensing report and is not needed as a license condition as originally incorporated. The analysis contained in the cycle specific reload report for this condition is also based on approved methodology as provided in GESTAR II.

#### Description of the Proposed Change

This change will delete FOL License Condition 2.C(5).

#### Safety Discussion

Deletion of License Condition 2.C(5) from the FOL is an administrative change that does not impact any UFSAR design basis accident or transient. This license condition is more appropriately controlled by other licensing bases documents, which include the NRC approved GESTAR II analyses and the cycle specific reload licensing reports, and should not be part of the FOL. This approach is consistent with the guidance of Generic Letter 88-16, "Removal of Cycle-Specific Parameter Limits From Technical Specifications." The limits contained in the licensing condition were discussed in Supplemental Reload Licensing Report for PBAPS, Unit 3 Reload 9 Cycle 10, Revision 0, GE Document No. 23A7215, dated October 1993.

Deletion of the license condition will not involve any physical changes to plant structures, systems, or components (SSCs). Implementation of this proposed change will not effect the manner in which SSCs are tested. Additionally, this FOL change will not alter any safety limits which ensure the integrity of fuel barriers, and will not result in any increase to onsite or offsite dose.

#### Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed change to the PBAPS, Unit 3 FOL does not constitute a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

- 1) The proposed change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

Deletion of License Condition 2.C(5) is an administrative change that will not involve a significant increase in the probability or consequences of any accident previously evaluated. This license condition is more appropriately controlled by other licensing bases documents, which include the NRC approved GESTAR II analyses and the cycle specific reload licensing reports, and should not be part of the FOL. Additionally, this FOL change will not alter any safety limits which ensure the integrity of fuel barriers, and will not result in any increase to onsite or offsite dose.

No physical changes are being made to the plant, nor are there any changes being made in the operation of the plant as a result of this change which could involve a significant increase in the probability or consequences of any accident previously evaluated. Additionally, this change will not alter the operation of equipment assumed to be available for the mitigation of accidents or transients.

- 2) The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

Deletion of License Condition 2.C(5) is an administrative change that will not create the possibility of a new or different type of accident from any previously evaluated. Deletion of License Condition 2.C(5) is an administrative change that will not involve any changes to plant systems, structures or components (SCCs) which could act as new accident initiators. This change will not impact the manner in which SSCs are tested such that a new or different type of accident from any previously evaluated could be created.

- 3) The proposed change does not result in a significant reduction in the margin of safety.

No margins of safety are reduced as a result of the proposed deletion of License Condition 2.C(5). No safety limits will be changed as a result of this change. The proposed change does not involve a reduction in the margin of safety because this change is an administrative change which will not impact core limits or any other parameters that are used in the mitigation of a UFSAR design basis accident or transient. The change to the FOL does not introduce any hardware changes, and will not alter the intended operation of plant structures, systems or components utilized in the mitigation of UFSAR design basis accidents or transients. Additionally, this change will not introduce any new failure modes of plant equipment not previously evaluated.

Information Supporting an Environmental Assessment

An environmental assessment is not required for the proposed change since the proposed change conforms to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22(c)(9). The proposed change will have no impact on the environment. The proposed change does not involve a significant hazards consideration as discussed in the preceding section. The proposed change does not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the proposed change does not involve a significant increase in individual or cumulative occupational radiation exposure.

#### Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed the proposed change to the PBAPS, Unit 3 FOL and have concluded that the change does not involve an unreviewed safety question and will not endanger the health and safety of the public.



ATTACHMENT 2

PEACH BOTTOM ATOMIC POWER STATION  
UNIT 3

Docket No. 50-278

License No. DPR-56

FACILITY OPERATING LICENSE CHANGE

List of Attached Pages

Unit 3

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