



PECO ENERGY

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

August 28, 1995

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
Revision E to TSCR 93-16
Implementation of the Improved Technical Specifications.

REFERENCE: 1) Letter from G. A. Hunger, Jr. (PECO Energy Company) to U. S. Nuclear
Regulatory Commission (USNRC) dated September 29, 1994

2) Letter from G. A. Hunger, Jr. (PECO Energy Company) to USNRC, dated
March 3, 1995

3) Letter from G. A. Hunger, Jr. (PECO Energy Company) to USNRC, dated
August 4, 1995

4) Letter from G. A. Hunger, Jr. (PECO Energy Company) to USNRC, dated
August 11, 1995

Dear Sir:

In the above reference letter 1, PECO Energy transmitted Technical Specifications Change Request (TSCR) 93-16 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. This TSCR proposed an overall conversion from the PBAPS existing custom Technical Specifications to the Improved Technical Specifications (ITS) as contained in NUREG 1433, "Standard Technical Specifications General Electric Plants, BWR/4."

As part of the overall conversion, PECO Energy is relocating many of the current Technical Specification (CTS) requirements to various plant procedures or the Technical Requirements Manual. These requirements are or will be incorporated by reference into the UFSAR such that changes to them will be subject to the requirements of 10CFR50.59. PECO Energy will maintain an auditable record of changes to these provisions.

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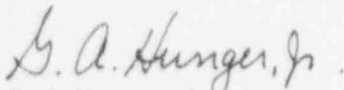
In the above reference letter 2, PECO Energy submitted a matrix of relocated items. The purpose of this matrix is to indicate the change control mechanism (e.g., 10CFR50.59, 10CFR50.54(a)) which will be used to evaluate future changes to the items relocated out of CTS. PECO Energy proposes to redesignate the change control mechanism from 10CFR50.59, as indicated previously, to 10CFR50.54(a) for the following six items: 1) the review and audit functions of the Plant Operations Review Committee (PORC, CTS 6.5.1), 2) the review and audit function of the Nuclear Review Board (NRB, CTS 6.5.2), 3) the requirement for PORC and NRB to review Reportable Event Reports (CTS 6.6.1.b), 4) the requirement for written procedures that meet the requirements of Section 5.1 and 5.3 of the ANSI N18.7-1972 (CTS 6.8.1.a), 5) the requirement for procedures that cover QA for environmental monitoring to use the guidance of Regulatory Guide 4.1 (CTS 6.8.1.c), and 6) the requirement for Fire Protection Inspections (CTS 6.12.)

In the above reference letter 3, PECO Energy proposed the approach that would be used to implement new and revised Surveillance Requirements (SRs). An auditable record of, and an implementation schedule for the procedure changes associated with the development of the ITS will be maintained. In addition, PECO Energy will maintain the documentation of these changes in accordance with the record retention requirements in the QA plan.

In the above reference letter 4, PECO Energy submitted the final TS pages for ITS, and discussed a technical issue regarding the volume of fuel oil in the Emergency Diesel Generator (EDG) storage and days tanks. PECO Energy has reviewed this issue and has revised the appropriate pages of the ITS. The revised pages constitute Revision E to TSCR 93-16, and are included as an Attachment to this letter. Also included in the Revision E is a proposed change to a Note to a Surveillance Requirement in the primary containment isolation valve section of ITS. PECO Energy has determined that this revision does not alter our evaluation of any of the 10CFR50.59 standards, and therefore, does not affect our conclusion that this revision to TSCR 93-16 does not constitute an unreviewed safety question. We have determined that the proposed revision does not affect the conclusion of the No Significant Hazards Considerations or the Environmental Assessment.

If you have any questions, please contact us.

Very truly yours,



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

Affidavit

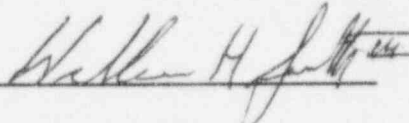
Attachment

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

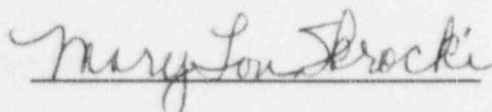
COMMONWEALTH OF PENNSYLVANIA :
 : SS.
COUNTY OF CHESTER :

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 letter regarding TSCR 93-13 for 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 28th day
of August 1995.


Notary Public

Notarial Seal
Mary Lou Skrocki, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires May 17, 1999
Member, Pennsylvania Association of Notaries