

50-277/278  
352/353



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

September 28, 1995

Mr. George A. Hunger, Jr.  
Director-Licensing, MC 62A-1  
PECO Energy Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
P.O. Box No. 195  
Wayne, PA 19087-0195

SUBJECT: PECO ENERGY COMPANY'S INTENTIONS ON FINAL SAFETY ANALYSIS REPORT (FSAR) REVISIONS, PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 AND LIMERICK GENERATING STATION, UNITS 1 AND 2

Dear Mr. Hunger:

In a letter dated April 3, 1995, PECO Energy Company (PECO) stated its intent to discontinue the practice of providing updated reproductions of controlled drawings (piping and instrumentation diagrams (P&IDs), electrical single line diagrams, plant arrangements, etc.) as part of the periodic FSAR update submittals for Peach Bottom Atomic Power Station, Units 2 and 3 (PBAPS) and Limerick Generating Station, Units 1 and 2 (LGS). PECO further stated that the controlled versions of these figures, though no longer updated in the FSAR, are considered part of the current plant licensing and design basis and part of the "Safety Analysis Report." As such, you stated, changes to the information on the diagrams will be governed by 10 CFR 50.59.

The scope of the information required to be included in the FSAR submitted as part of the application for an operating license is specified in 10 CFR 50.34(b). It is required in 10 CFR 50.34(b)(2) that the FSAR contain a description of the structures, systems and components of the facility in sufficient detail to permit understanding of the system designs and their relationship to safety evaluations. The P&IDs included in the FSAR contribute substantially to the NRC's understanding of the systems and their interfaces. Therefore, the information contained in the P&IDs provided in the FSAR cannot be removed without providing a suitable substitute.

It is the staff's understanding that there is substantial regulatory burden, approximately \$100,000 per year, associated with providing these revised P&IDs. This is due to the fact that the P&IDs provided in the FSAR are created solely for the FSAR and contain, in a different format, information available on the controlled P&IDs used by the plant staff.

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The staff has considered your stated intentions and believes that they are contrary to the requirements of 10 CFR 50.71(e) and 10 CFR 50.34(b). However, the staff recognizes that creating separate P&IDs solely for inclusion in the FSAR is an unnecessary regulatory burden. Therefore, the staff would consider a request from PECO to substitute other plant drawings for those currently in the respective plant FSARs as long as the substitutions were acceptable. For example, plant controlled drawings could be substituted for FSAR figures as long as the controlled drawings were incorporated in the FSAR by reference, were updated on the same frequency as the FSAR update and placed on the docket in a similar fashion as the FSAR amendment, and the staff agreed that the controlled drawings were acceptable replacements.

Should you have any additional questions on the staff's position, please do not hesitate to contact me at (301) 415-1428.

Sincerely,

/S/ F. Rinaldi for

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

Docket Nos. 50-277/50-278  
 and 50-352/50-353

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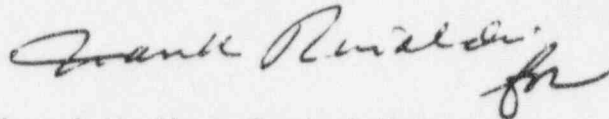
G. Hunger, Jr.

- 2 -

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Sincerely,



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

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Mr. George A. Hunger, Jr.  
PECO Energy Company

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Units 2 and 3  
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Units 1 and 2

cc:

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