

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of :
PHILADELPHIA ELECTRIC COMPANY : Docket Nos. 50-277
: 50-278

SECOND AMENDMENT TO FEBRUARY 11, 1982

APPLICATION FOR AMENDMENT

OF

FACILITY OPERATING LICENSES

DPR-44 & DPR-56

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On February 11, 1982, Philadelphia Electric Company, Licensee under Facility Operating License DPR-44 and DPR-56 for Peach Bottom Units 2 and 3, filed an Application for Amendment of the Licenses which requested that the Technical Specifications contained in Appendix A of the Operating Licenses be amended by incorporating operability and surveillance requirements for new control and instrumentation systems. Installation of these

systems was required by NUREG-0737, "Clarification of TMI Action Plan Requirements", issued to all licenses on October 31, 1980.

On April 26, 1983, in a telephone conversation with the NRC project manager, Licensee was requested to consider the Standard Technical Specifications enclosed with Generic Letter No. 83-02 for several NUREG-0737 items. Consequently, to conform its earlier Application to the Standard Technical Specifications to the extent applicable, Licensee, on August 24, 1983, amended its Application of February 11, 1982, by adding: (1) personnel overtime work requirements, (2) reporting requirements for the primary coolant system safety relief valves, (3) a specification that Reactor Core Isolation Cooling (RCIC) system actuation test include the automatic restart on low water level signal, and (4) additional surveillance requirements for the RCIC suction transfer feature.

In Generic Letter No. 83-36, dated November 1, 1983, the NRC provided Standard Technical Specifications for NUREG-0737 items not addressed in the previous guidance (Generic Letter No. 83-02). A review of the technical specifications proposed in our February 11, 1982 Amendment Application indicates several inconsistencies with the most recent NRC guidance. Accordingly, Licensee hereby further amends its Application of February 11, 1982 by (1) deleting the proposed revised Technical Specification pages 77, 77a, 86a, 93, 209a, and 209b referred to in the February 11, 1982 Application; (2) substituting therefor updated

pages iii, 77, 77a, 78, 86a, 93, 93a, 172, 173, 194, 233, and 233a; and (3) adding new pages 78a, 268 and 269. The revisions are indicated by a vertical bar. Changes to the existing Technical Specifications, which were proposed on pages 69, 81a, and 86 of the February 11, 1982 Application, remain unchanged by this Amendment to the Application.

A point-by-point discussion of Licensee's response to the guidance in Generic Letter No. 83-36 follows:

(1) Reactor Coolant System Vents (II.B.1)

The Peach Bottom BWR-4 design does not have an isolation condenser, and therefore no changes in the Technical Specifications are required for this NUREG-0737 Action Plan item.

(2) Postaccident Sampling (II.B.3)

Proposed Specification 6.19 on page 268 conforms with the Standard Technical Specifications (Generic Letter No. 83-36, Enclosure 3, page 5) establishing administrative controls for the operation, maintenance, and training associated with the postaccident sampling system.

(3) Noble Gas Effluent Monitors (II.F.1.1)

The proposed operability and surveillance requirements for the high range noble gas effluent radiation

monitors as shown on proposed Technical Specification pages 77a, 78, and 86a conform to the Standard Technical Specifications (Generic Letter No. 83-36, Enclosure 3, pages 7, 8, and 9).

(4) Sampling and Analysis of Plant Effluents (II.F.1.2)

Proposed Specification 6.19 on page 268 conforms with the Standard Technical Specifications (Generic Letter No. 83-36, Enclosure 3, page 5) establishing administrative controls for the operation, maintenance, and training associated with the radioactive iodine and particulate sampling systems.

(5) Containment High-Range Radiation Monitor (II.F.1.3)

The proposed operability and surveillance requirements for the high range drywell radiation monitors as shown on proposed Technical Specification pages 77a, 78, and 86a conform to the Standard Technical Specifications (Generic Letter No. 83-36, Enclosure 3, pages 7, 8, and 9).

(6) Containment Pressure Monitor (II.F.1.4)

Drywell pressure is monitored by two instrument channels with a range of 0 to 70 psig, and two channels with a range of 0 to 225 psig. The STS addresses only the wide range (0-225 psig) drywell pressure instrument. Currently, the Peach Bottom Technical Specifications (page 77) address

only the pressure instrument with a 70 psi range. Licensee proposes to leave the specification for the 70 psi instrument in the Technical Specifications and add specifications for the wide range instruments, with an action statement for inoperability that is a modified version of the guidance in the STS (Generic Letter No. 83-36, Enclosure 3, page 8). The proposed action statement (page 78a) would conform to the STS, unless both 70 psi drywell pressure instruments are operable, in which case additional outage time for the 225 psi instrument would be permissible. The bases for the proposed action statement associated with inoperability of the 225 psi range drywell pressure instrument are as follows:

1. The proposed action statement recognizes the presence of two operable 70 psi range pressure instruments that are under the control of the Technical Specifications.
2. The 70 psi range pressure instruments monitor the full pressure transient spectrum associated with the design basis accidents. The existence of pressures above 70 psig are beyond the design basis of the plant and represent an extremely low probability event.

3. The STS proposes an instrument check frequency of once per month. When combined with the STS allowable outage periods of 7 days and 48 hours (one and two inoperable instruments, respectively), the potential maximum outage would be 37 days for one inoperable wide range instrument, and 32 days for two inoperable wide range instruments. The proposed specification for Peach Bottom would specify a daily surveillance check (page 86 in the February 11, 1982 Application), and allowable outage periods of 30 days and 7 days for one and two inoperable instruments, respectively. This would result in a potential maximum outage of 31 days for one inoperable instrument, and 8 days for two inoperable instruments. Consequently, the proposed specification would result in a shorter potential period of instrument inoperability.

The same action statement is proposed for the subatmospheric drywell pressure instrument for the reasons presented above for the 225 psi instrument.

The following table summarizes the proposed changes:

LCO SHUTDOWN COMPARISON

Drywell Pressure Instrument	One Inoperable		Both Inoperable	
	Current	Proposal	Current	Proposal
Drywell Pressure (0-70 psig)	30 days	30 days	7 days	7 days
Drywell Pressure (wide range)	Shutdown Not Required	30 days if both 0-70 psig operable. 7 days if a 0-70 psig inoperable	Shutdown Not Required	7 days if both 0-70 psig operable 48 hours if a 0-70 psig inoperable
Drywell Pressure (subatmospheric)	Shutdown Not Required	Same as wide range	Shutdown Not Required	Same as wide range

(7) Containment Water Level Monitor (II.F.1.5)

Containment water level is monitored in the suppression chamber by two instrument channels with a range of 1 to 21 feet from the bottom of the chamber and two channels with a range of 2 feet centered around the normal water level. The STS addresses only the wide range (1-21 ft.) level instrument. Currently, the Peach Bottom Technical Specifications (page 77) addresses only the narrow range level instrument. Licensee proposes to leave a specification for both narrow range level instruments in the Technical Specification and add specifications for the wide range level instruments, with an action statement for inoperability that is a modified version of the guidance in the STS (Generic Letter No. 83-36, Enclosure 3, page 8). The proposed action statement (page 78a) would conform to the STS, unless both narrow range level instruments are

operable, in which case additional outage time for the wide range level instrument would be permissible. The bases for the proposed action statement associated with inoperability of the wide range containment water level monitor are as follows:

1. The proposed action statement recognizes the presence of two operable narrow range suppression chamber water level instruments that are under the control of the Technical Specifications.
2. The STS proposes an instrument check frequency of once per month. When combined with the STS allowable outage periods of 7 days and 48 hours (one and two inoperable instruments, respectively), the potential maximum outage would be 37 days for one inoperable wide range instrument, and 32 days for two inoperable wide range instruments. The proposed specification for Peach Bottom would specify a daily surveillance check (page 86 in the February 11, 1982 Application), and allowable outage periods of 30 days and 7 days for one and two inoperable instruments, respectively. This would result in a potential maximum outage of 31 days for one inoperable instrument, and 8 days for two inoperable instruments. Consequently, the

proposed specification would result in a shorter potential period of instrument inoperability.

Additionally, Licensee proposes a revision in the action statement for the narrow range suppression chamber water level instruments. Currently, if both channels of the narrow range instrument are inoperable, a plant shutdown shall be initiated within 6 hours. The proposed revision would permit both instruments to be inoperable for 7 days. The bases for the proposed revision are as follows:

1. Unlike the wide range suppression chamber water level instruments, the narrow range instruments are not safety-related equipment due to their limited range.
2. The proposed revision would establish uniformity with action statements for other surveillance instrumentation, and therefore improved clarity and reduces the potential for misinterpretation of the specifications.
3. The proposed action statement recognizes the presence of the wide range instruments that are under the control of the Technical Specifications.

The following table summarizes the proposed changes:

LCO SHUTDOWN COMPARISON

Suppression Chamber Water Level Instrument	One Inoperable		Both Inoperable	
	Current	Proposal	Current	Proposal
Narrow Range (0-2 ft.)	30 days	30 days	6 hours	7 days
Wide Range (1-21 ft.)	Shutdown Not Required	30 days if both narrow range operable. 7 days if a narrow range inoperable.	Shutdown Not Required	7 days if both narrow range operable. 48 hour if a narrow range inoperable.

(8) Containment Hydrogen Monitor (II.F.1.6)

The proposed operability and surveillance requirements for the drywell hydrogen concentration analyzer and monitor, as shown on proposed Technical Specification pages 77a and 86a, conform to the Standard Technical Specifications (Generic Letter No. 83-36, Enclosure 3, pages 7, 8 and 9). Further, Licensee requests that the current specifications regarding this instrument be deleted from Technical Specification pages 172, 173 and 194, since these specifications are superseded by the proposed specifications on pages 77a and 86a.

Additionally, Licensee requests that an obsolete surveillance provision on the bottom of page 172 (identified by an asterisk) be deleted. As established in Amendments 24 and 23 for Peach Bottom Units 2 and 3, respectively, specification 4.7.A.6.c, marked with an asterisk, will apply

prior to the end of the first refueling outage of each unit. After the end of the first refueling outage for each unit, only that portion of specification 4.7.A.6.c marked with a double asterisk would apply. The amendment was written in this manner to accommodate the installation of the Containment Atmosphere Dilution System during the first refueling outage. The double asterisk applied to the current surveillance requirement on page 173. Amendments 69 and 68 for Peach Bottom Units 2 and 3, respectively, removed the obsolete footnotes from pages 173 and 174. Amendments 71 and 69 for Peach Bottom Units 2 and 3, respectively, removed the double asterisk from the current surveillance specification on page 173. The request to delete the provision identified by a single asterisk on page 172 will complete the removal of these obsolete specifications.

(9) Control Room Habitability Requirements (III.D.3.4)

The NRC guidance in Generic Letter No. 83-36 requests that if the results of the utility's analysis of a postulated accidental release of toxic gases indicated a need for installing the toxic gas detection system, it should be included in the Technical Specifications. Licensee's analysis pursuant to NUREG-0737, Item III.D.3.4 concluded that the only hazard to control room habitability was the storage of chlorine gas on site associated with the river water chlorination system. Subsequently, in

accordance with Licensee's commitment in correspondence dated April 2, 1981 (J. W. Gallagher, PECO, to D. G. Eisenhut), a sodium hypochlorite system has been installed and the chlorine gas removed from the site. Consequently, a toxic gas detection system is not required to ensure control room habitability. The modification to the chlorination system was the only design change deemed to be necessary to comply with Item III.D.3.4. Licensee's actions on this issue were approved by correspondence dated June 7, 1982 (J. F. Stolz, NRC, to E. G. Bauer, Jr., PECO).

Further, the NRC guidance specified that two independent control room emergency air filtration systems should comply with the operability requirements in the Standard Technical Specifications. Licensee was previously requested to modify its license to conform with an earlier version of the STS in regards to the operability requirements of the control room emergency air filtration systems. Consequently, Amendments 9 and 7 to the Peach Bottom Operating License, Units 2 and 3, respectively, were issued on June 25, 1975. Apparently, the STS has since been revised, and the Generic Letter has the effect of requiring a second revision to the Operating License regarding the specifications for this system. Accordingly, Licensee proposes revisions to the Limiting Conditions For Operation as shown on pages 233 and 233a for the control room emergency

air filtration that conform to the operability requirements of the Standard Technical Specifications. The changes requested would:

- a. Require suspension of core alterations, handling of irradiated fuel in the secondary containment, and operations with a potential for draining the reactor vessel if the operability requirements cannot be met. The current Peach Bottom Technical Specifications requires only suspension of fuel handling operations.
- b. Require hot shutdown within 12 hours and cold shutdown within the following 24 hours if the operability requirements cannot be met. The current Peach Bottom Technical Specifications requires cold shutdown within 24 hours.

Proposed Revision In Reference to Generic Letter 83-02

In Generic Letter No. 83-02, dated January 10, 1983, the NRC provided Standard Technical Specifications for several NUREG-0737 items, including the new automatic control features for RCIC as required by NUREG-0737, Items II.K.3.13 and II.K.3.22. By Amendment Application dated August 24, 1983, Licensee proposed changes that addressed this STS. Subsequently,

the NRC staff reviewing the Application informed the licensee, by telephone, of the need to revise the Application to conform with the STS provided with Generic Letter No. 83-02. Accordingly, Licensee hereby amends its Application of August 24, 1983 Application, and substituting therefor updated page 130. The revision adds a surveillance requirement to verify the automatic transfer feature of the Reactor Core Isolation Cooling System suction. Additionally, the temporary amendment change issued December 15, 1978 for Peach Bottom Unit 3 regarding continued power operation with an inoperable RCIC is now obsolete and is therefore deleted from proposed page 130.

Additional Amendment Requests

1. Reactor Water Level Instrumentation

The action statement for the zero to sixty-inch range reactor water level instrument on page 77 of the current Technical Specifications requires a plant shutdown within 7 days if one channel is inoperable and shutdown within 48 hours if both channels are inoperable. Licensee proposes an increase in the LCO shutdown provision to 30 days for one inoperable channel, and 7 days for two inoperable channels. The bases for this revision are (1) the 0-60 inch reactor level instruments are not safety-related equipment, (2) the availability of safety-related reactor level instruments

(wide and fuel range), and (3) the compensatory measures provided by the proposal to strengthen the LCO action statements for the wide and fuel range level instruments.

By Application dated February 11, 1982, Licensee proposed the addition of the wide and fuel range reactor water level recorders. The proposed action statement associated with these instruments would require a plant shutdown within 30 days if both channels were inoperable. Since these instruments are safety-related and installed to meet the requirements of NUREG-0737, Item II.F.2, Licensee proposes to strengthen the LCO action statement as proposed in the following table:

Reactor Water Level Instrument	LCO SHUTDOWN COMPARISON			
	One Inoperable		Both Inoperable	
	Current	Proposal	Current	Proposal
Narrow Range (0-60 inches)	7 days	30 days	2 days	7 days
Wide Range (-165 to + 50 inches)	Shutdown Not Required	30 days if both narrow range operable. 7 days if a narrow range inoperable.	30 Days (2-11-82 application)	7 days if both narrow operable. 48 hours if a narrow range inoperable.
Fuel Zone (-325 to 0 inches)	Shutdown Not Required	30 days if both narrow range operable. 7 days if a narrow range inoperable.	30 day (2-11-82 application)	7 days if both narrow range operable. 48 hours if a narrow range inoperable.

2. Reactor Pressure Recorder - Safety Parameter Display System

By correspondence dated April 15, 1984, Licensee committed to the addition of two reactor pressure recorders to the Safety Parameter Display Panel in the control room. This modification is necessary to meet the requirements of NUREG-0737, Supplement 1, and is supported by a safety analysis submitted September 28, 1983 (J. W. Gallagher, Philadelphia Electric Company, to D. G. Eisenhut, NRC). Accordingly, Licensee proposes to incorporate the new reactor pressure recorders into Table 3.2.F (page 77) of the Technical Specifications. The proposed action statement (page 78a) conforms to the STS, unless both of the other reactor pressure instruments are operable, in which case additional outage time for these instruments would be permitted.

3. Effective Date of Amendment

Licensee proposes that the once-per-operating cycle surveillance requirements become effective during the first refueling outage, commencing four months after approval of this amendment application, and all other provisions of this application become effective four months after approval of this amendment application so as to accommodate the writing and approval of the appropriate procedures.

The following table summarizes the revisions proposed by this application.

Tech Spec	NUREG-0737	
<u>Page</u>	<u>Requirement</u>	<u>Specification</u>
77	Reactor Water Level	LCO
77	Reactor Pressure	LCO
77	Drywell Pressure	LCO
77	Suppression Chamber Water Level	LCO
77a	Drywell Radiation Monitors	LCO
77a	Effluent Release Monitors	LCO
77a	Hydrogen Concentration Monitors	LCO
78	Surveillance Instrumentation	Action Statements
78a	Surveillance Instrumentation	Action Statements
86a	Drywell Radiation Monitors	Surveillance
86a	Effluent Release Monitors	Surveillance
86a	Hydrogen Concentration Monitors	Surveillance
93	Surveillance Instrumentation	Bases
93a	Surveillance Instrumentation	Bases
130	RCIC Suction Transfer	Surveillance
172	(Remove obsolete material)	--
173	(Remove obsolete material)	--
194	(Remove obsolete material)	--
233	Control Room Emergency Ventilation	LCO

233a	Control Room Emergency Ventilation	LCO
268	Post Accident Sampling	Administrative Controls
269	Post Accident Sampling	Bases

Since the February 11, 1982 amendment application submittal, pages 77, 77a, 78, 78a, 93a, and 130 have been revised by amendments 93, 97, and 100 for Unit 2, and amendments 95, 99, and 102 for Unit 3. The proposed pages submitted with this application reflect these approved revisions.

Significant Hazards Consideration Determination

This application, as amended, does not reduce the requirements of the current Technical Specifications. All of the proposed changes constitute additional Limiting Conditions of Operation, and surveillance requirements not presently included in the Technical Specifications, and are in the interest of enhancing safe operations and complying with the requirements of NUREG-0737.

The Commission has provided guidance concerning the application of the standards for determining whether license amendments involve no significant hazards considerations by providing certain examples (48 FR 14870). Two of the examples (ii and vii) of actions involving no significant hazards consideration are: (1) a change that constitutes an additional limitation, restriction, or control not presently included in the


technical specifications, and (2) a change to make a license conform to changes in the regulations where the license change results in very minor changes to facility operations clearly in keeping with the regulations. The changes proposed by this application fit both of these examples of an action not involving a significant hazards consideration.

Consequently, Licensee has concluded, in accordance with NRC Guidance (48 F.R. 14870) and the provisions of Section 50.92 of the Commission's regulations, that these changes do not constitute a significant hazards consideration since they do not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or
- (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or
- (3) involve a significant reduction in a margin of safety.

The Plant Operating Review Committee and the Nuclear Review Board (off-site safety review committee) have reviewed these proposed changes to the Technical Specifications and have concluded that they do not involve an unreviewed safety question or a significant hazard consideration and will not endanger the health and safety of the public.

Respectfully submitted,
PHILADELPHIA ELECTRIC COMPANY


Vice President

COMMONWEALTH OF PENNSYLVANIA :

: SS.

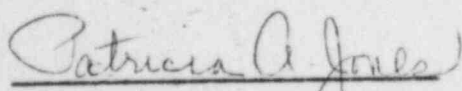
COUNTY OF PHILADELPHIA :

S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company; that he has read the foregoing Application for Amendment of Facility Operating Licenses 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.



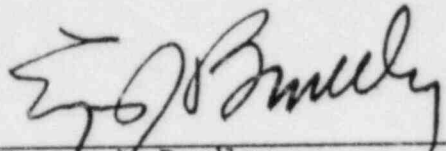
Subscribed and sworn to
before me this 5th day
of Oct. 1984


Notary Public

PATRICIA A. JONES
Notary Public, Phila., Phila. Co.
My Commission Expires Oct. 13, 1986

CERTIFICATE OF SERVICE

I certify that service of the foregoing Second Amendment was made upon the Commonwealth of Pennsylvania, by mailing a copy thereof, via first-class mail, to Thomas R. Gerusky, Director, Bureau of Radiological Protection, P. O. Box 2063, Harrisburg, PA 17120; all this 9th day of October, 1984.



Eugene J. Bradley

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Philadelphia Electric Company