Station Support Department

10CFR50.90

PECO ENERGY

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

November 21, 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
Technical Specifications Change Request No. 95-10

Dear Sir:

PECO Energy Company (PECO Energy) hereby submits Technical Specifications (TS) Change Request No. 95-10, in accordance with 10CFR50.90, requesting changes to Appendix A of the Peach Bottom Facility Operating Licenses. The proposed changes provide for changing the Surveillance Requirements for the high pressure test of the High Pressure Coolant Injection and Reactor Core Isolation Cooling systems. Also, an administrative change is proposed to eliminate reference to a Section which was previously eliminated. These proposed changes are to the Improved Technical Specifications.

Attachment 1 to this letter describes the proposed changes and provides justification for the changes. Attachment 2 provides marked-up TS pages indicating the proposed changes. If you have any questions concerning this matter, please do not hesitate to contact us.

Very truly yours,

M. C. Kray for

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

A001
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COMMONWEALTH OF PENNSYLVANIA :

: ss.

COUNTY OF CHESTER :

D. B. Fetters, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy; the Applicant herein; that he has read the enclosed Technical Specifications Change Request No. 95-10, "High Pressure Test of HPCI and RCIC Systems" for Peach Bottom Atomic Power Station, Unit 2 and Unit 3, Facility Operating License Nos. 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 21ST day
of November 1995.

Notary Public

ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

DOCKET NOS. 50-277
50-278

LICENSE NOS. DPR-44
DPR-56

TECHNICAL SPECIFICATIONS CHANGE REQUEST

95-10

"HIGH PRESSURE TEST OF HPCI AND RCIC SYSTEMS"

SUPPORTING INFORMATION FOR CHANGES - 4 PAGES

Docket Nos. 50-277
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License Nos. DPR-44
DPR-56

PECO Energy Company requests that the Technical Specifications (TS) for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3 be amended as proposed below to provide for the changing of Surveillance Requirements (SR) for the high pressure test of the High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) systems. Also, an administrative change to the Ventilation Filter Testing Program (VFTP) is proposed to eliminate reference to a Section which was previously eliminated.

Provided below is a discussion and description of the proposed changes, a safety assessment, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

The marked-up pages indicating the proposed changes are provided in Attachment 2.

We request that, if approved, the changes be effective by January 4, 1996.

Discussion and Description of the Proposed Changes

Revise Improved Technical Specifications (ITS) SR 3.5.1.8 and SR 3.5.3.3 to change the test pressure for the high pressure test of the HPCI and RCIC systems.

Revise ITS Section 5.5.7 to delete reference to ITS Section 5.5.7.f.

During the development of the PBAPS ITS submittal, the test pressure for the high pressure test of the HPCI and RCIC systems in SR 3.5.1.8 and SR 3.5.3.3 was specified as "with reactor pressure ≤ 1030 psig and ≥ 920 psig." The PBAPS power rerate analysis was performed originally using an initial reactor vessel pressure of 1038 psig. In the development of the LCO for the PBAPS ITS submittal, it was realized that 1038 psig provided very little margin from normal steady state reactor operating pressure (1035 psig); therefore, a reanalysis (reactor vessel overpressure protection analysis) was performed to support extending the reactor pressure limit to 1053 psig. This value was put into the LCO 3.4.10, "Reactor Steam Dome Pressure," prior to the submittal of the PBAPS ITS. As such, reactor operation is allowed with reactor pressure ≤ 1053 psig.

Normal oporation at reactor pressure greater than 1030 psig results in a concern associated with the performance of SR 3.5.1.8 and SR 3.5.3.3. In order to be in compliance with the requirements of SR 3.5.1.8 and SR 3.5.3.3, reactor pressure must be reduced every 92 days for the HPCI system and every 92 days for the RCIC system to satisfy the test pressure requirements of SR 3.5.1.8 and SR 3.5.3.3. The intent of the pressure band provided in SR 3.5.1.8 and SR 3.5.3.3 is to ensure that the test could be performed under normal reactor operating conditions without having to adjust reactor pressure. Therefore, it is proposed that the upper test pressure in SR 3.5.1.8 and SR 3.5.3.3 be raised to match the upper limit of Specification 3.4.10. As a result, the proposed changes eliminate the need to adjust reactor pressure from normally stable plant conditions to perform the test, thereby reducing the potential for a plant transient.

In addition, the lower limit for the test pressure in SR 3.5.1.8 and SR 3.5.3.3 is proposed to be increased from 920 psig to 940 psig. This change is based on experience gained from power rerate conditions. The reactor test pressure of 940 psig corresponds to the minimum EHC pressure setpoint that provides adequate steam flow at which reactor power can be increased without the need to adjust the EHC pressure set-point during operation in MODE 1. Increasing the lower test pressure from 920 psig to 940 psig does not impact when the performance of the test is required. The Notes to SR 3.5.1.8 and SR 3.5.3.3 state that the SR is not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. Changing the lower reactor test pressure from 920 psig to 940 psig does not impact when the SRs must be performed since the flow requirement portion of the Note is not satisfied until after a reactor pressure of 940 psig has been achieved.

The HPCI and RCIC systems are both designed to provide adequate core cooling at reactor pressures from 150 psig to 1150 psig. SR 3.5.1.8 and SR 3.5.3.3 still will require verifying HPCI and RCIC pumps can develop the required flow rates against system head corresponding to reactor pressure.

Also during development of the PBAPS ITS submittal, a SR for the control room emergency ventilation system was retained from current TS and identified as Section 5.5.7.f in the ITS submittal. This SR was subsequently deleted from the current TS by Amendments Nos. 202 and 205 on May 30, 1995. Section 5.5.7.f was eliminated from the ITS submittal, but ITS Section 5.5.7 still refers to Section 5.5.7.f which does not exist.

Safety Assessment

The proposed changes do not involve any physical changes to plant systems, structures, or components (SSC), or the addition of new SSC. The proposed changes have no impact on any safety analysis assumptions.

Information Supporting a Finding of No Significant Hazards Consideration

The changes proposed in the Application do not constitute a Significant Hazards Consideration in that:

i) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because the changes will not alter assumptions relative to initiation and mitigation of analyzed events. These changes will not alter the operation of process variables, or SSC as described in the safety analysis. These changes do not involve any physical changes to plant SSC or the manner in which these SSC are operated, maintained, modified or inspected. Routine testing is not assumed to be an initiator of any analyzed event. The proposed changes will not alter the operation of equipment assumed to be available for the mitigation of accidents or transients by the plant safety analysis or licensing basis. These changes have been confirmed to ensure no previously evaluated accident has been adversely affected. The proposed lower test pressure for the HPCI and RCIC system flow testing is consistent with the minimum EHC pressure setpoint at which reactor power can be increased without the need to adjust the EHC pressure setpoint during operation in MODE 1. Increasing the lower test pressure from 920 psig to 940 psig does not impact when the performance of the test is required. The proposed upper test pressure for the HPCI and RCIC system flow testing is consistent with the Reactor Steam Dome Pressure Limit in

Specification 3.4.10. Additionally, the HPCI and RCIC systems are both designed to provide adequate core cooling at reactor pressures from 150 psig to 1150 psig. SR 3.5.1.8 and SR 3.5.3.3 still will require verifying HPCI and RCIC pumps can develop the required flow rates against system head corresponding to reactor pressure. Therefore, the proposed changes provide adequate assurance that the HPCI and RCIC systems will be maintained operable. In addition, these proposed changes eliminate the need to adjust reactor pressure from normally stable plant conditions to perform the test. As such, the probability of plant transients is expected to be reduced. Therefore, the proposed changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.

ii) The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed changes do not alter the plant configuration (no new or different type of equipment will be installed or removed) and will not alter the method used by any system to perform its design function. The proposed changes do not allow plant operation in any mode that is not already evaluated in the SAR. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

iii) The proposed changes do not involve a significant reduction in a margin of safety. The proposed change to the VFTP in Section 5.5.7 is administrative in nature and does not involve any technical changes. This proposed change will not reduce a margin of safety because it has no impact on any safety analysis assumptions. Because this change is administrative in nature, no question of safety is involved. The proposed changes also revise the upper and lower test pressure for the HPCI and RCIC system high pressure flow tests. These changes do not impact safety analysis assumptions or the ability of the HPCI and RCIC systems to perform their design functions. The HPCI and RCIC systems are designed to provide adequate core cooling at reactor pressures from 150 psig to 1150 psig. SR 3.5.1.8 and SR 3.5.3.3 still will require verifying HPCI and RCIC pumps can develop the required flow rates against system head corresponding to reactor pressure. The proposed lower test pressure for the HPCI and RCIC system flow testing is consistent with the minimum EHC pressure setpoint that provides adequate steam flow at which reactor power can be increased without the need to adjust the EHC pressure setpoint during operation in MODE 1. Increasing the lower test pressure from 920 psig to 940 psig does not impact when the performance of the test is required. The proposed upper test pressure for the HPCI and RCIC system flow testing is consistent with the initial condition for the reactor vessel overpressure protection analysis. In addition, the proposed changes provide the benefit of eliminating the need to adjust reactor pressure from normally stable plant conditions to perform the test, thereby reducing the potential for a plant transient. Therefore, these changes will not involve a significant reduction in a margin of safety.

Information Supporting an Environmental Assessment

An environmental impact assessment is not required for the changes proposed by this Application because the changes conform to the criteria for "actions eligible for categorical exclusion," as provided for under 10CFR51.22(c)(9). The requested changes will have no impact on the environment. The proposed changes do not involve a

Significant Hazards Consideration as discussed in the preceding section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The proposed changes do not authorize any change in the authorized power level of the facility. In addition, the proposed changes do not involve a significant increase in individual or cumulative occupation radiation exposure.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed the proposed changes to the TS and have concluded that the changes do not involve an unreviewed safety question and will not endanger the public health and safety.