ATTACHMENT 2

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

LIST OF ATTACHED PAGES

Unit 2	Unit 3
3.5-6	3.5-6
3.5-13	3.5-13
5.0-12	5.0-12
B 3.5-14	B 3.5-14
B 3.5-28	B 3.5-28

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.5.1.8	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure ≤ 1053 and ≥ 920 psig, the HPCI pump can develop a flow rate ≥ 5000 gpm against a system head corresponding to reactor pressure.	92 days
SR 3.5.1.9	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure ≤ 175 psig, the HPCI pump can develop a flow rate ≥ 5000 gpm against a system head corresponding to reactor pressure.	24 months
SR 3.5.1.10	----------NOTE---------- Vessel injection/spray may be excluded. ---------- Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.	24 months
SR 3.5.1.11	----------NOTE---------- Valve actuation may be excluded. ---------- Verify the ADS actuates on an actual or simulated automatic initiation signal.	24 months

(continued)

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.5.3.1	Verify the RCIC System piping is filled with water from the pump discharge valve to the injection valve.	31 days
SR 3.5.3.2	Verify each RCIC System manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	31 days
SR 3.5.3.3	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure $\leq$ 1053 psig and $\geq$ 920 psig, the RCIC pump can develop a flow rate $\geq$ 600 gpm against a system head corresponding to reactor pressure.	92 days
SR 3.5.3.4	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure $\leq$ 175 psig, the RCIC pump can develop a flow rate $\geq$ 600 gpm against a system head corresponding to reactor pressure.	24 months

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

1) Once per 12 months for standby service or after 720 hours of system operation; and,

2) After each complete or partial replacement of the HEPA filter train or charcoal adsorber filter; after any structural maintenance on the system housing; and, following significant painting, fire, or chemical release in any ventilation zone communicating with the system while it is in operation.

Tests described in Specifications 5.5.7.d and 5.5.7.e shall be performed once per 24 months.

The test described in Specification 5.5.7.f shall be performed once per 12 months.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

a. Demonstrate for each of the ESF systems that an inplace test of the HEPA filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, Section 5c, and ASME N510-1989, Sections 6 (Standby Gas Treatment (SGT) System only) and 10, at the system flowrate specified below.

ESF Ventilation System	Flowrate (cfm)
SGT System	7200 to 8800
Main Control Room Emergency Ventilation (MCREV) System	2700 to 3300

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.5.1.7, SR 3.5.1.8, and SR 3.5.1.9 (continued)

pressure when the HPCI System diverts steam flow. Reactor steam pressure must be ≤ 1050 and ≥ 920 psig to perform SR 3.5.1.8 and greater than or equal to the Electro-Hydraulic Control (EHC) System minimum pressure set with the EHC System controlling pressure (EHC System begins controlling pressure at a nominal 150 psig) and ≤ 175 psig to perform SR 3.5.1.9. Adequate steam flow is represented by at least 2 turbine bypass valves open. Therefore, sufficient time is allowed after adequate pressure and flow are achieved to perform these tests. Reactor startup is allowed prior to performing the low pressure Surveillance test because the reactor pressure is low and the time allowed to satisfactorily perform the Surveillance test is short. The reactor pressure is allowed to be increased to normal operating pressure since it is assumed that the low pressure test has been satisfactorily completed and there is no indication or reason to believe that HPCI is inoperable. Therefore, SR 3.5.1.8 and SR 3.5.1.9 are modified by Notes that state the Surveillances are not required to be performed until 12 hours after the reactor steam pressure and flow are adequate to perform the test.

The 92 day Frequency for SR 3.5.1.7 and SR 3.5.1.8 is consistent with the Inservice Testing Program requirements. The 24 month Frequency for SR 3.5.1.9 is based on the need to perform the Surveillance under the conditions that apply just prior to or during a startup from a plant outage. Operating experience has shown that these components will pass the SR when performed at the 24 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

SR 3.5.1.10

The ECCS subsystems are required to actuate automatically to perform their design functions. This Surveillance verifies that, with a required system initiation signal (actual or simulated), the automatic initiation logic of HPCI, CS, and LPCI will cause the systems or subsystems to operate as designed, including actuation of the system throughout its emergency operating sequence, automatic pump startup and actuation of all automatic valves to their required positions. This SR also ensures that the HPCI System will

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.5.3.2 (continued)

The 31 day Frequency of this SR was derived from the Inservice Testing Program requirements for performing valve testing at least once every 92 days. The Frequency of 31 days is further justified because the valves are operated under procedural control and because improper valve position would affect only the RCIC System. This Frequency has been shown to be acceptable through operating experience.

SR 3.5.3.3 and SR 3.5.3.4

The RCIC pump flow rates ensure that the system can maintain reactor coolant inventory during pressurized conditions with the RPV isolated. The flow tests for the RCIC System are performed at two different pressure ranges such that system capability to provide rated flow is tested both at the higher and lower operating ranges of the system. Additionally, adequate steam flow must be passing through the main turbine or turbine bypass valves to continue to control reactor pressure when the RCIC System diverts steam flow. Reactor steam pressure must be $\leq$ 1050 and $\geq$ 920 psig to perform SR 3.5.3.3 and greater than or equal to the Electro-Hydraulic Control (EHC) System minimum pressure set with the EHC System controlling pressure (the EHC System begins controlling pressure at a nominal 150 psig) and $\leq$ 175 psig to perform SR 3.5.3.4. Adequate steam flow is represented by at least 2 turbine bypass valves open. Therefore, sufficient time is allowed after adequate pressure and flow are achieved to perform these SRs. Reactor startup is allowed prior to performing the low pressure Surveillance because the reactor pressure is low and the time allowed to satisfactorily perform the Surveillance is short. The reactor pressure is allowed to be increased to normal operating pressure since it is assumed that the low pressure Surveillance has been satisfactorily completed and there is no indication or reason to believe that RCIC is inoperable. Therefore, these SRs are modified by Notes that state the Surveillances are not required to be performed until 12 hours after the reactor steam pressure and flow are adequate to perform the test.

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.1.8	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ----------	
	Verify, with reactor pressure ≤ 1053 and ≥ 920 psig, the HPCI pump can develop a flow rate ≥ 5000 gpm against a system head corresponding to reactor pressure.	92 days
SR 3.5.1.9	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ----------	
	Verify, with reactor pressure ≤ 175 psig, the HPCI pump can develop a flow rate ≥ 5000 gpm against a system head corresponding to reactor pressure.	24 months
SR 3.5.1.10	----------NOTE---------- Vessel injection/spray may be excluded. ----------	
	Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.	24 months
SR 3.5.1.11	----------NOTE---------- Valve actuation may be excluded. ----------	
	Verify the ADS actuates on an actual or simulated automatic initiation signal.	24 months

(continued)

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.5.3.1	Verify the RCIC System piping is filled with water from the pump discharge valve to the injection valve.	31 days
SR 3.5.3.2	Verify each RCIC System manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	31 days
SR 3.5.3.3	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure ≤ 1030 (53) psig and ≥ 920 psig, the RCIC pump can develop a flow rate ≥ 600 gpm against a system head corresponding to reactor pressure.	92 days
SR 3.5.3.4	----------NOTE---------- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ---------- Verify, with reactor pressure ≤ 175 psig, the RCIC pump can develop a flow rate ≥ 600 gpm against a system head corresponding to reactor pressure.	24 months

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

1) Once per 12 months for standby service or after 720 hours of system operation; and,

2) After each complete or partial replacement of the HEPA filter train or charcoal adsorber filter; after any structural maintenance on the system housing; and, following significant painting, fire, or chemical release in any ventilation zone communicating with the system while it is in operation.

Tests described in Specifications 5.5.7.d and 5.5.7.e shall be performed once per 24 months.

The test described in Specification 5.5.7.f shall be performed once per 12 months.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

a. Demonstrate for each of the ESF systems that an inplace test of the HEPA filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, Section 5c, and ASME N510-1989, Sections 6 (Standby Gas Treatment (SGT) System only) and 10, at the system flowrate specified below.

ESF Ventilation System	Flowrate (cfm)
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(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.5.1.7, SR 3.5.1.8, and SR 3.5.1.9 (continued)

pressure when the HPCI System diverts steam flow. Reactor steam pressure must be ≤ 1038 and ≥ 920 psig to perform SR 3.5.1.8 and greater than or equal to the Electro-Hydraulic Control (EHC) System minimum pressure set with the EHC system controlling pressure (EHC System begins controlling pressure at a nominal 150 psig) and ≤ 175 psig to perform SR 3.5.1.9. Adequate steam flow is represented by at least 2 turbine bypass valves open. Therefore, sufficient time is allowed after adequate pressure and flow are achieved to perform these tests. Reactor startup is allowed prior to performing the low pressure Surveillance test because the reactor pressure is low and the time allowed to satisfactorily perform the Surveillance test is short. The reactor pressure is allowed to be increased to normal operating pressure since it is assumed that the low pressure test has been satisfactorily completed and there is no indication or reason to believe that HPCI is inoperable. Therefore, SR 3.5.1.8 and SR 3.5.1.9 are modified by Notes that state the Surveillances are not required to be performed until 12 hours after the reactor steam pressure and flow are adequate to perform the test.

The 92 day Frequency for SR 3.5.1.7 and SR 3.5.1.8 is consistent with the Inservice Testing Program requirements. The 24 month Frequency for SR 3.5.1.9 is based on the need to perform the Surveillance under the conditions that apply just prior to or during a startup from a plant outage. Operating experience has shown that these components will pass the SR when performed at the 24 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

SR 3.5.1.10

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(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.5.3.2 (continued)

The 31 day Frequency of this SR was derived from the Inservice Testing Program requirements for performing valve testing at least once every 92 days. The Frequency of 31 days is further justified because the valves are operated under procedural control and because improper valve position would affect only the RCIC System. This Frequency has been shown to be acceptable through operating experience.

SR 3.5.3.3 and SR 3.5.3.4

The RCIC pump flow rates ensure that the system can maintain reactor coolant inventory during pressurized conditions with the RPV isolated. The flow tests for the RCIC System are performed at two different pressure ranges such that system capability to provide rated flow is tested both at the higher and lower operating ranges of the system. Additionally, adequate steam flow must be passing through the main turbine or turbine bypass valves to continue to control reactor pressure when the RCIC System diverts steam flow. Reactor steam pressure must be $\leq$ 1053 and $\geq$ 920 psig to perform SR 3.5.3.3 and greater than or equal to the Electro-Hydraulic Control (EHC) System minimum pressure set with the EHC System controlling pressure (the EHC System begins controlling pressure at a nominal 150 psig) and $\leq$ 175 psig to perform SR 3.5.3.4. Adequate steam flow is represented by at least 2 turbine bypass valves open. Therefore, sufficient time is allowed after adequate pressure and flow are achieved to perform these SRs. Reactor startup is allowed prior to performing the low pressure Surveillance because the reactor pressure is low and the time allowed to satisfactorily perform the Surveillance is short. The reactor pressure is allowed to be increased to normal operating pressure since it is assumed that the low pressure Surveillance has been satisfactorily completed and there is no indication or reason to believe that RCIC is inoperable. Therefore, these SRs are modified by Notes that state the Surveillances are not required to be performed until 12 hours after the reactor steam pressure and flow are adequate to perform the test.

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