Station Support Department

10CFR50.90

PECO ENERGY

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

November 30, 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. 95-12

Dear Sir:

PECO Energy Company (PECO Energy) hereby submits Technical Specifications (TS) Change Request No. 95-12, in accordance with 10CFR50.90, requesting changes to Appendix A of the Peach Bottom Facility Operating Licenses. The proposed changes provide for changing the minimum allowable control rod scram accumulator pressure and charging water header pressure from a value of 955 psig to a value of 940 psig. 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,

G. A. Hunger, Jr.

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

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. 95-12, "Control Rod Scram Accumulator Pressure and Charging Water Header Pressure," 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 30th 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
95-12

"CONTROL ROD SCRAM ACCUMULATOR PRESSURE AND CHARGING WATER HEADER PRESSURE"

SUPPORTING INFORMATION FOR CHANGES - 3 PAGES

Docket Nos. 50-277
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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 changing the minimum allowable control rod scram accumulator pressure and charging water header pressure from a value of 955 psig to a value of 940 psig.

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) Limiting Condition for Operation (LCO) 3.1.5, "Control Rod Scram Accumulators," to change the minimum allowable control rod scram accumulator pressure and charging water header pressure from a value of 955 psig to a value of 940 psig. The PBAPS TS currently being used do not specify a required control rod scram accumulator pressure.

During the development of the PBAPS ITS submittal, the nominal pressure requirement of ≥ 955 psig was incorporated into Surveillance Requirement (SR) 3.1.5.1. The TS requirement for control rod scram accumulator pressure was addressed in General Electric Service Information Letter 429 Revision 1 (SIL 429R1). SIL 429R1 was issued to address numerous TS violations experienced by various Boiling Water Reactors (BWRs) as a result of control rod scram accumulator pressure switch setpoint drift. SIL 429R1 recommended that owners of BWRs amend their TS to allow the required setting for the control rod scram accumulator low pressure alarm to be set at 940 psig or greater on decreasing pressure. Therefore, in order to take advantage of the full setpoint range and provide additional margin to the TS requirement, a change to the limiting control rod scram accumulator pressure from ≥ 955 psig to ≥ 940 psig is proposed.

A change to the required charging water header pressure from ≥ 955 psig to ≥ 940 psig is also proposed. During the development of the PBAPS ITS submittal, a required charging water header pressure of ≥ 955 psig was incorporated based upon a required control rod scram accumulator pressure of ≥ 955 psig. The function of the charging water header is to pressurize the control rod scram accumulators to the required pressure.

Therefore, since the required control rod scram accumulator pressure is being changed, the required charging water header pressure is also being changed.

A similar change to SR 3.9.5.2 is proposed for control rod scram accumulator pressure during Refueling Operations. A similar change to SR 3.10.8.6 is proposed for charging water header pressure during Special Operations.

Safety Assessment

The control rod scram accumulator stores a pressurized volume of water which is used in assisting the insertion of a control rod during a reactor scram. When the reactor pressure is greater than 900 psig, reactor pressure alone is capable of fully inserting all control rods. At a reactor pressure of less than 900 psig, reactor pressure alone may not be sufficient to fully insert all the control rods in the required time. Therefore, the control rod scram accumulators must contain sufficient stored energy to ensure a complete reactor scram under these conditions. The minimum pressure of the stored volume of water required to provide sufficient stored energy was determined to be ≥ 940 psig. Because a control rod scram accumulator pressure of ≥940 psig has been determined to be acceptable, changing SR 3.1.5.1 and SR 3.9.5.2 for control rod scram accumulator pressure from ≥ 955 psig to ≥ 940 psig will have no impact on the control rod drive (CRD) hydraulic system's ability to scram the reactor within the required control rod scram times.

The function of the charging water header is to pressurize the control rod scram accumulators to the required pressure. Because the required control rod scram accumulator pressure has been determined to be ≥ 940 psig, changing the required charging water header pressure from ≥ 955 psig to ≥ 940 psig will have no impact on the CRD hydraulic system's ability to scram the reactor.

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 control rod scram accumulator pressure and charging water header pressure ≥ 940 psig has been determined to be adequate to ensure a complete reactor scram occurs within the time limits assumed in the safety analyses. 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 CRD hydraulic system will continue to be operated within its design basis parameters. 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 changes do not impact safety analysis assumptions or the ability of the CRD hydraulic system to perform its design function. The proposed minimum allowable control rod scram accumulator pressure is consistent with the pressure recommended in SIL 429R1. The proposed changes assure that a complete reactor scram occurs within the time limits assumed in the safety analyses. 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 Operation 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.

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 95-12

LIST OF ATTACHED PAGES

| UNIT 2 | UNIT 3 |
|---|---|
| 3.1-16 | 3.1-16 |
| 3.1-17 | 3.1-17 |
| 3.9-8 | 3.9-8 |
| 3.10-23 | 3.10-23 |
| B3.1-31 | B3.1-31 |
| B3.1-32 | B3.1-32 |
| B3.1-33 | B3.1-33 |
| B3.9-14 | B3.9-14 |
| B3.9-15 | B3.9-15 |
| B3.10-36 | B3.10-36 |