

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of :
PHILADELPHIA ELECTRIC COMPANY : Docket No. 50-277

APPLICATION FOR AMENDMENT
OF
FACILITY OPERATING LICENSE
DPR-44

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Philadelphia Electric Company, Licensee under Facility Operating License DPR-44 for Peach Bottom Atomic Power Station Unit No. 2, hereby requests that the Technical Specifications in Appendix A of the Operating Licensee be amended by revising certain sections as indicated by a vertical bar in the margin of attached pages iv, 119, 133a, 133d, 133e, 142a, 142i, 241, adding a new page 142k, and by deleting pages 142, 142b, 142e and 142f.

The changes to the Technical Specifications are being requested to: (1) identify the operating limits for all fuel types for Cycle 7 operation; (2) identify the MAPLHGR limits for

all fuel types for Cycle 7 operation; (3) permit operation with hafnium (General Electric Hybrid I) control rods; (4) modify bases to delete reference to specific shutdown margin (value) provided by Standby Liquid Control System to reduce need for future cycle-dependent revisions; and (5) modify the MAPLHGR reduction factor for single loop operations.

The proposed changes on pages 133d, 133e, and 142a identify the operating limits for the fuel being used for Cycle 7 operation. An analysis of the safety considerations involved in the reactor refueling and the Cycle 7 operating limits for all fuel types is set forth in a document titled, "Supplemental Reload Licensing Submittal for Peach Bottom Atomic Power Station Unit 2 Reload 6" (General Electric Document #22A8597), June 1984, which is filed herewith and incorporated herein by reference.

The proposed changes incorporate MAPLHGR limits for Type BP8DRB299 and BP8DRB299H (BP8X8R pre-pressurized fuel with barrier cladding) as shown on page 142i and on new page 142k. The results of an analysis of the safety considerations involved in these MAPLHGR limits is set forth in a General Electric Company document titled "Loss of Coolant Accident Analysis for Peach Bottom Atomic Power Station Unit 2", Errata and Addenda Number 10 to NEDO-24081, dated June 1984, which is filed herewith and incorporated herein by reference.

Additionally, the MAPLHGR reduction factors (Paragraph 3.5.I on page 133a of the Peach Bottom Unit 2 Technical Specifications) for 7X7, 8X8R and LTA fuel are deleted since

these fuel types are no longer being used in the Unit 2 reactor. For the same reason, pages 142, 142e and 142f are deleted. The single loop reduction factor for all P8X8R and BP8X8R fuel is changed to 0.79. The reduction factors are based on the safety analysis for single loop operation provided in General Electric Company Document NEDO-24229-1, Errata and Addenda Sheet No. 2, June 1984, which is filed herewith and incorporated herein by reference.

Further, the proposed changes on page 241 permit operation with Type I (production type) General Electric Hybrid I Control Rod Assemblies (HICRs). An analysis of the safety considerations involved with the Type I HICRs is set forth in a document titled "Safety Evaluation of the General Electric Hybrid I Control Rod Assembly" (NEDE-22290), December 1982, which has been reviewed and found acceptable by the NRC in a letter dated August 22, 1983, C. D. Thomas (U.S. NRC) to J. F. Klapproth (General Electric), "Acceptance for Referencing of Licensing Topical Report NEDE-22290 (HICR Safety Evaluation)".

Finally, the proposed change on Page 119 (Bases) would delete specific reference to shutdown margin (SDM) provided by the Standby Liquid Control System (SBLCS). This is consistent with the requirements given in Section 3.3.2.1.3 of NEDE-24011-P-A (General Electric Standard Application for Reactor Fuel, April, 1983). A calculation of the SDM provided by the SBLCS is performed for each reload and documented as shown in Item 5 of Appendix A to NEDE-24011-P-A. The SDM provided by the SBLCS is likely to vary in succeeding cycles and this change is intended

to eliminate the necessity of revising the Bases of the Technical Specifications for each reload. An analysis of the safety considerations associated with the SBLCS is provided in General Electric Company Document #22A8597, previously referenced. This change is the same as that approved by the U.S. NRC as part of Amendment No. 92 for Peach Bottom Unit No. 3 on May 4, 1983.

Page 142b is deleted since this fuel assembly operating limit specification is now incorporated on page 142a. The list of figures on page iv is required to reflect proposed changes previously described.

Significant Hazards Considerations Determination

The proposed change which modifies the Bases to delete reference to specific shutdown margin (value) provided by Standby Liquid Control System is the same as that previously approved by the U.S. NRC for Peach Bottom Unit No. 3 and is purely administrative in nature.

The proposed change which permits operation with hafnium (General Electric Hybrid I) control rods is based on NEDE-22290, previously found acceptable by the NRC, and is therefore administrative in nature.


The proposed changes which identify MAPLHGR and operating limits and MAPLHGR reduction factors for all fuel types for Cycle 7 operation are not significant changes since the new fuel assemblies are not significantly different from those previously found acceptable by the NRC for operation in Unit 2.

Consequently, pursuant to the guidance provided by the NRC in the Federal Register, April 6, 1983, 48 FR 14870, the proposed changes do not involve a significant hazards consideration since the request does 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 Operation Review Committee and the Nuclear Review Board have reviewed these proposed changes to the Technical Specifications, and have concluded that they do not involve any unreviewed safety question or a significant hazard consideration and will not endanger the health and safety of the public.

Respectfully submitted,
PHILADELPHIA ELECTRIC COMPANY

By _____



Vice President

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF PHILADELPHIA : SS.
:

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

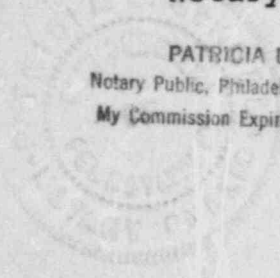
That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Amendment to Application for Amendment of Facility Operating Licenses and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

S. L. Daltroff

Subscribed and sworn to before me this 7th day of September 1984

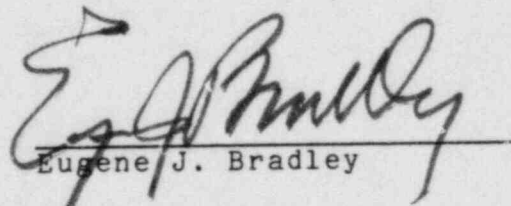
Patricia D. Scholl
Notary Public

PATRICIA D. SCHOLL
Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires February 10, 1986



CERTIFICATE OF SERVICE

I certify that service of the foregoing Application 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 7th day of September, 1984.

A handwritten signature in cursive script, appearing to read "E. J. Bradley", is written over a horizontal line.

Eugene J. Bradley

Attorney for
Philadelphia Electric Company