PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS 955-65 CHESTERBROOK BLVD. WAYNE, PA 19087-5691 (215) 640-6000

NUCLEAR ENGINEERING & SERVICES DEPARTMENT

Ma' 21, 1992

Docket Nos. 50-277

50-278

License Nos.

DPR-44 DPR-56

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, D.C. 20555

SUBJECT:

Peach Bottom Atomic Power Station, Units 2 and 3 Facility Operating License Change Request 90-06

- REFERENCES: 1. Peach Bottom Atomic Power Stat.on, Unit 2, Facility Operating License, Issued August 8, 1973
 - Peach Bottom Atomic Power Statio..., Unit 3, Facility Operating License Issued July 2, 1974
 - Peach Bottom Atomic Power Station, Units 2 and 3, Construction Permits Issued January 31, 1968

Dear Sir:

Pursuant to 10CFR50.90, Philadelphia Electric Company (PECo) proposes to amend Facility Operating Licenses DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS) Units 2 and 3 to provide for 40 full years of operation from the original date of operating license issuance. The current Operating Licenses (Reference 1 and 2) expire 40 years from the issuance of the construction permits (Reference 3), thereby allowing for an effective operating period of approximately thirty-four years six months and thirty-three years seven months for Unit 2 and Unit 3 respectively. Thus, an operating license extension of approximately five years six months for PBAPS Unit 2 and six years five months for PBAPS Unit 3 will result from this proposed change.

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Attachment 1 to this letter describes the proposed change, and provides justification for the change. Attachment 2 contains the revised Facility Operating License pages. Attachment 3 provides the Safety and Environmental Assessment completed to evaluate the potential impact of this proposed license amendment.

If you have any questions regarding this matter, please contact us.

Sincerely,

G. J. Beck

Manager

Licensing Section

LCR 9U-06

/kaf

Enclosures: Affidavit, Attachment 1, Attachment 2, Attachment 3

cc: T. T. Martin, Administrator, Region I, USNRC

J. J. Lyash, USNRC Senior Resident Inspector, PB

W. P. Dornsife, Commonwealth of Pennsylvania

COMMONWEALTH OF PENNSYLVANIA: CHENTY OF CHESTER D. R. Helwig, being first duly sworn, deposes and says: That he is Vice President of Philadelphia Electric Company; the Applicant herein: that he has read the attached License Amendment Change Request 90-05 for changes to the Peach Bottom Atomic Power Station Facility Operating Licenses 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. Subscriped and sworn to before me this Notary Public Notangi Saal Erica A. Sarrion, Notany Public Trino, finin Twp., Chester Lorinty My Commission Expires July 10, 1

PEACH BOTTOM ATOMIC POWER STATION UNITS 2 AND 3

Docket Nos. 50-277 50-278

License Nos. DPR-44

DPR-56

LICENSE AMENDMENT CHANGE (LOT I

90-00

"Proposed Amendment to change the PBAPS Operat' g License expiration dates to reflect the operating license issuance dates"

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Philadelphia Electric Company (PECo), Licensee under Facility Operating Licenses DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station (PBAPS) Unit No. 2 and Unit No. 3, respectively, requests that the PBAPS Operating Licenses be amended to extend the expiration date of the above Operating Licenses to 40 years from the date of issuance. Proposed changes to the Operating Licenses are indicated by vertical bars in the margins of the pages contained in Attachment 2 and listed here: DPR-44 page 8 and DPR-56 page 8.

The proposed changes affect the expiration date of the PBAPS Operating Licenses. Currently, Peach Bottom Units 2 and 3 are licensed for operation for 40 years commencing with the January 31, 1968 issuance of their construction profits. Thus, both Operating Licenses will expire on January 31, 2000. Current NRC policy is to issue operating licenses for a 40 year period commencing with the date of issuance of the Operating Licenses.

Peach Bottom Unit ? was issued a low power Operating License on August 8, 1973, with an expiration date of January 31, 2008. Accounting for the 5 years 6 months required for construction, this represents an effective operating period of approximately 34 years 6 months. Peach Bottom Unit 3 was issued a full power Operating License on July 2, 1974, with an expiration date of January 31, 2008. Accounting for the 6 years 5 months required for construction, this represents an effective operating period of approximately 33 years 7 months.

For Peach Pottom Units 2 and 3 the proposed amendment will change the Operating License expiration dates to provide for a full 40 years of operation for which the plants were designed. Accordingly, it is proposed that the Peach Bottom Atomic Power Station Units 2 and 3 Operating Licenses be amended to change the expiration dates to reflect the Operating License issuance dates. The amended expiration dates will then become August 8, 2013 for Unit 2 and July 2, 2014 for Unit 3.

Licensee proposes that these changes be effective as of the issuance date of the license amendment.

Description of Changes

Licensee proposes the following changes:

(1) Change the expiration date on page 8 of the PBAPS Unit 2 Facility Operating License (DPR-44) to August 8, 2013

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(2) Change the expiration date on page 8 of the PBAPS Unit 3 Facility Operating License (DPR-56) to July 2, 2014.

SAFETY DISCUSSION

This change request is proposed to change the expiration dates of the PBAPS Units 2 and 3 Operating Licenses to provide for a full 40 years of operation for which the plants were initially designed. These changes are consistent with current NRC Policy in which operating licenses are issued for a 40 year period commencing with the date of issuance of the operating license. Refer to Attachment 3 for a detailed safety and environmental assessment.

No Significant Hazards Consideration

Licensee proposes that the requested changes do not involve Significant Hazards Considerations for the following reasons:

i) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

> This determination is based primarily on the fact that a 40-year service life was considered during the design and construction of the plant. Although this does not mean that some components will not wear out during the plant lifetime, design features were incorporated which maximize the inspectability of structures, systems and equipment. Surveillance and maintenance practices that are implemented in accordance with the Code of Federal Regulations, ASME standards and the facility Technical Specifications ensure that PBAPS Units 2 and 3 will continue to operate as designed. In addition, these programs provide assurance that unexpected degradation in plant equipment will be identified and corrected. The reactor vessel and its internals were designed for forty(40) years of operation at full power with an 80% capacity factor (32 effective full power years). reactor vessel surveillance capsules program provides a means of monitoring the radiation induced changes in the mechanical and impact properties of vessel materials in accordance with 10 CFR 50 Appendix H. This program provides additional assurance that adverse cumulative effects of power operation can be monitored and detected.

> Aging analyses and Environmental Qualification have been performed for all electrical equipment important to safety in accordance with the requirements of Environmental

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Qualification Rule 10 CFR 50.49. This program included identification of qualified lifetimes for the required equipment and incorporation of maintenance requirements into appropriate plant procedures to maintain the qualification of the required equipment for the life of the plant. This qualification program provides assurance that electrical equipment important to safety will function as required if called upon to mitigate design basis events, regardless of the term of the license.

Safety-related mechanical equipment has been specifically addressed through the use of the Inservice Inspection (ISI) and Inservice Testing (IST) Programs. The ISI and IST programs, in conjunction with the above referenced programs, assure that mechanical equipment will be properly maintained throughout the life of the plant.

In summary, the requested amendment to the Operating Licenses is administrative in nature and will neither increase or decrease the probability or consequences of an accident previously evaluated. The accident analyses have been performed on the basis of a 40 year plant operating life. The probability and consequences of the accidents previously evaluated are not affected by this proposed license extension since the assumptions used for the accident analysis do not change. The interrelated programs at PBAPS, like those discussed previously, further assure that the proposed amendment 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 previously evaluated.

The proposed amendment involves only a change in the expiration date of the Operating Licenses. No safety analyses are affected. No new or different accident type is created.

i(i) The proposed changes to do not involve a significant reduction in a margin of safety.

The proposed amendment involves only a change in the expiration dates of the Operating Licenses. As discussed above, inspection, maintenance and surveillance practices of the PBAPS ISI, IST, EQ and maintenance programs ensure that structures, systems, and components will be

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refurbished and/or replaced, as necessary, to maintain the margins of safety required by the Technical Specifications.

SAFETY AND ENVIRONMENTAL IMPACT ASSESSMENT

The functional capabilities of the mechanical, plectrical, and structural components of the plant are assured through the conservatisms inherent in the design, construction, and operation of the facility and through the inspection, maintenance, and surveillance practices of the PBAPS In-Service Inspection/Testing, Environmental Qualification, and Maintenance Programs programs ensure that structures, systems, and components will be refurbished and/or replaced, as necessary, to maintain the margins of safety required by the Technical Specifications. PECo concludes that extending the expiration dates of PBAPS Unit 2 and Unit 3 to recapture the time lost during the construction period is consistent with the planus initial design basis and with the existing safety analyses in that all issues associated with plant aging have already been addressed in the FSAR, UFSAR and other licensing submittals. Therefore, the proposed amendment has no significant impact on plant safety.

Likewise, there will be no significant changes to previously anticipated levels of radiation exposures as a result of the proposed amendment. This includes both occupational and offsite radiation exposure. Population estimates within the 60 mile radius of PBAPS as well as for the five counties located within the 10 mile Emergency Planning Zone (EPZ) are well within early projections contained in the Environmental Report (ER). Final Environmental Statement (FES) and the FSAR. Radioactive waste and fuel cycle effects are minimal and will not have a significant effect on either on-site or off-site radiation exposures. Discharges to the Susquehanna River will continue to be in compliance with PBAPS National Pollutant Discharge Elimination System (NPDES) permit and in accordance with existing license conditions. No significant non-radiological environmental effects are likely to be encountered that have not already been considered.

Attachment 3 provides additional details which support the foregoing conclusions regarding the safety and environmental assessment. This assessment was completed to evaluate the potential impact of the proposed change to the PBAPS Units 2 and 3 Operating Licenses.

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PORC AND NRB REVIEW

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes and have concluded that they do not involve an unreviewed safety question and are not a threat to the health and safety of the public.