

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of :
: Docket No. 50-277
: 50-278
PHILADELPHIA ELECTRIC COMPANY

APPLICATION FOR AMENDMENT
OF
FACILITY OPERATING LICENSES
DPR-44 & DPR-56

Edward G. Bauer, Jr.
Eugene J. Bradley

2301 Market Street
Philadelphia, Pennsylvania 19101

Attorneys for
Philadelphia Electric Company

8409210131 840914
PDR ADOCK 05000277
P PER

The requested changes to the Technical Specifications would delete the tabular listing of snubbers from the Technical Specifications in accordance with U.S. Nuclear Regulatory Commission positions contained in Generic Letter 84-13, "Technical Specifications for Snubbers", dated May 3, 1984. The NRC has concluded in Generic Letter 84-13 "that such listings are not necessary provided the snubber Technical Specification is modified to specify which snubbers are required to be operable". The proposed changes to specification 3.11.D.1 incorporate the criterion of the present Technical Specifications by specifying which snubbers are required to be operable and which snubbers are exempted from this requirement.

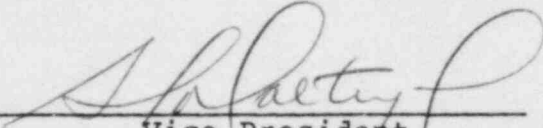
Significant Hazards Consideration Determination

The amendment request establishes snubber Technical Specifications that conform with the NRC position in Generic Letter 84-13 and the revision to Revision 1 of the Surveillance Requirements of NRC Generic Letter dated November 20, 1980, forwarded to Licensees, as an attachment to Generic Letter 84-13. Changes to snubber quantities, types or locations are subject to the provisions of 10 CFR 50.59, with such changes reflected under the recordkeeping requirements of Technical Specification 4.11.D.9. Consequently, these changes do not involve a significant hazards consideration since they do 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 Operational Review Committee and the Nuclear Review Board (Off-Site Safety Review Committee) have reviewed these proposed changes to the Technical Specifications, and have concluded that they do not involve an unreviewed safety question or a significant hazard consideration, and will not endanger the health and safety of the public.

Respectfully submitted,
PHILADELPHIA ELECTRIC COMPANY

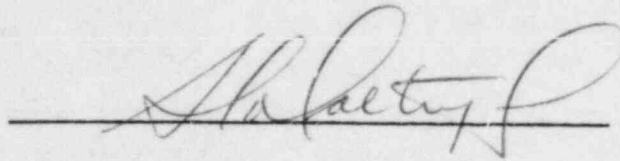


Vice President

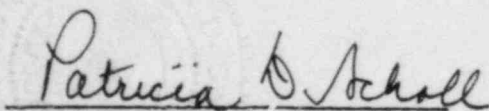
COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF PHILADELPHIA : SS.
:

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 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.



Subscribed and sworn to
before me this 12th day
of September 1984

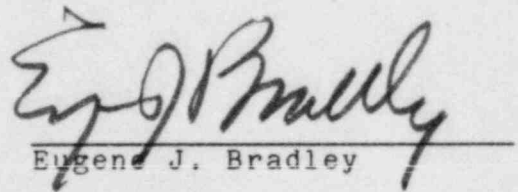


Notary Public

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 14th day of September, 1984.

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

Eugene J. Bradley

Attorney for
Philadelphia Electric Company