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NUCLEAR ENGINEERING & SERVICES DEPARTMENT

May 26, 1992

Docket No. 50-278

License No. DPR-56

Mr. Thomas T. Martin
Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

SUBJECT: Peach Bottom Atomic Power Station, Unit 3
Request for a Temporary Waiver of Compliance from
the Technical Specifications Sections 3.7.C.1, 3.7.C.2,
and 4.7.C.1.d "Secondary Containment"

Dear Sir:

After discussions with the NRR and Region I staff which provided clarifications to guidance contained in the February 22, 1990 memo from T. E. Murley (Director, Office of Nuclear Reactor Regulation), Philadelphia Electric Company requests a Temporary Waiver of Compliance from the requirements of Peach Bottom Atomic Power Station, Unit 3 Technical Specifications (TS) Sections 3.7.C.1, 3.7.C.2, and 4.7.C.1.d "Secondary Containment".

LCO 3.7.C.1 states that "Secondary containment integrity shall be maintained during all modes of plant operation ...". Further, LCO 3.7.C.2 states that "(1) If Specification 3.7.C.1 cannot be met, the unit shall be placed in Hot Shutdown within 12 hours and in Cold Shutdown within 36 hours. Irradiated fuel handling operations in the secondary containment, core alterations, and activities which could reduce the shutdown margin shall be suspended". PECO is requesting a Temporary Waiver of Compliance from these Technical Specifications such that Secondary Containment may be intentionally breached to allow the replacement of a Residual Heat Removal System (RHR) pump motor providing that within the 12 hour period specified in TS 3.7.C.2 Secondary Containment can be re-established or the unit will be placed in Hot Shutdown.

Further, it is requested that the testing outlined in Surveillance Requirement 4.7.C.1.d not be performed. In its place, a local leak test will be performed upon replacement of the equipment hatch to ensure that it has been properly installed.

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We are requesting the Temporary Waiver of Compliance be effective upon the opening of the Secondary Containment equipment hatch which is anticipated to occur Wednesday, May 27, 1992 and concluded within 12 hours.

The February 22, 1990 memo requests Licenses to provide the following:

- (1) A discussion of the requirements for which a waiver is requested,

As stated above, we are requesting a Temporary Waiver of Compliance from the requirements of TS 3.7.C.1, 3.7.C.2, and 4.7.C.1.d.

- (2) A discussion of circumstances surrounding the situation including the need for prompt action, and a description of why the situation could not have been avoided,

On Friday, May 22, 1992 at 1740 hours, the motor for the PBAPS, Unit 3 Residual Heat Removal System "A" pump experienced a failure during the quarterly IST test resulting in the pump being declared inoperable. In accordance with PBAPS TS LCO 3.5.A.4 ("Core Spray and LPCI Subsystem") a seven day LCO was entered. In order to replace the "A" RHR pump motor prior to the conclusion of the seven day LCO, Secondary Containment must be breached. This breach will involve removal of the equipment hatch on elevation 135 directly above the RHR pump compartment.

- (3) A discussion of the compensatory actions (if any)

The following compensatory actions will be implemented:

During the entire time the equipment hatch is removed and until it is reinstalled, a fire watch and a security watch will be established per existing station procedures.

To minimize potential leakage paths, the floor and equipment drains located in the "A" and "C" RHR pump compartments will be verified to be plugged per existing station procedures.

Portable air monitoring will be performed in the "A" and "C" RHR pump compartments as prescribed by Health Physics.

The supply air registers to the "A" and "C" RHR pump compartments will be temporarily blocked off by use of blank off plates. The return air wall penetrations will remain open to assure that the "A" and "C" RHR pump compartments are maintained at a slight negative pressure relative to the outside during the pump motor movement.

Activities that could potentially generate radioactive releases in the "A" and "C" pump compartments will be restricted during the temporary breach of Secondary Containment.

Field walkdowns of the "A" and "C" RHR pump compartments were performed to identify and seal any potential leakage paths that could impact the ability of the SGTS to perform its design function if it was actuated while the equipment hatch was removed.

The Control Room will be directed to minimize plant actions which could result in a transient during the 12 hour period.

The following actions and evaluations have been or will be performed:

It has been determined that, if necessary, the equipment hatch can be reinstalled within 60 minutes.

Movement of the heavy loads (RHR pump motor) will be performed in accordance with existing station procedures.

The temporary breach of Secondary Containment will have negligible impact of the existing HELB and flood analysis.

After completion of the RHR pump motor movement and reinstallation of the equipment hatch, the Unit 3 Secondary Containment integrity will be re-established in accordance with a station procedure which will verify that the hatch has been properly installed.

The Technical Specification maximum allowable leakage rate with SGTS operating is 10,500 cfm. The most recent SGTS leakage test measured leakage at a rate of 5500 cfm. This additional margin will allow for any undetected leakage.

(4) A preliminary evaluation of the safety significance and potential consequences of the proposed request,

PBAPS, Unit 3 is currently operating at full power. Initiating a unit shutdown subjects the plant to increased activities (e.g., shutdown and startup of equipment, power changes). This increases the potential for challenges and problems that are not present during steady state operation.

It has also been concluded that the breach of the Secondary Containment combined with the inoperable "A" pump of the RHR System will not increase the probability of core damage for the 12 hour period requested.

Peach Bottom TS currently require Secondary Containment integrity in all modes of operation except where certain conditions are met, or the unit is required to be in Hot Shutdown within 12 hours. There is no allowable out of service time provided. Since approximately 1/2 hour is required to place the unit in Hot Shutdown, the additional time permits repairs to Secondary Containment to be accomplished when Secondary Containment is found to be degraded. Being in a degraded condition for this limited period of time is therefore provided in the plant licensing basis. Given the foregoing, voluntary entry into a condition where Secondary Containment is breached is not an unreviewed safety question as long as containment integrity is restored or the unit is in Hot Shutdown in accordance with the requirements of TS paragraph 3.7.C.2. This position is more conservative than provided in Standard TS 3.6.5.1 which provides a 4 hour period to restore Secondary Containment prior to the action statement requiring Hot Shutdown in 12 hours.

Since the mode of Secondary Containment entry is known, a test to verify integrity of containment beyond the local breach is not required. The walkdown referred to in item (3) is further proof that Secondary Containment integrity was not effected prior to hatch removal.

- (5) A discussion which justifies the duration of the request,

This request is for a period not to exceed 12 hours from the opening of the equipment hatch, which is anticipated to begin Wednesday, May 27, 1992 to allow for replacement of the pump motor.

- (6) The basis for the licensee's conclusion that the request does not involve a significant hazards consideration, and

PECO has performed § 50.59 and has determined that this request does not involve an unreviewed safety question. Further, the request does not involve a significant hazards consideration because operation of Peach Bottom Atomic Station, Unit 3 with this change does not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The breach of Secondary Containment combined with the inoperability of the "A" pump of the RHR System will not increase the probability of core damage for the duration of the 12 hours. Compensatory actions are being taken to ensure a temporary Secondary Containment boundary exists during the replacement of the pump motor. Additional measures have been established to monitor potential radiation releases.

- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated. Additional compensatory actions which establish a temporary Secondary Containment barrier are being established for the 12 hour period. Additionally, the Secondary Containment performs a passive mitigating function and is not involved as an initiating feature which would create the possibility of a new or different kind of accident from any accident previously evaluated.
- (3) The proposed action will not result in a significant reduction in the margin of safety. Additional compensatory actions have been established to ensure that a temporary Secondary Containment barrier is established for the 12 hour period. Considering the compensatory measures and the short duration of the breach, these actions will not significantly reduce margins of safety.
- (7) The basis for the licensee's conclusion that the request does not involve irreversible environmental consequences.

The proposed actions do not have any adverse environmental impact since the change will not result in any increase in the amount or result in any change in the type of effluent which may be released off-site, and there will be no significant increase in individual occupational radiation exposures.

The Plant Operations Review Committee has reviewed this Request for a Temporary Waiver of Compliance.

Very truly yours,



G. J. Beck, Manager
Licensing Section

cc: J. J. Lyash, USNRC Senior Resident Inspector, PBAPS
Document Control Desk, USNRC