

# PHILADELPHIA ELECTRIC COMPANY

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September 27, 1984

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

RE: Peach Bottom Atomic Power Station, Unit 3  
Docket No. 50-278

Dear Mr. Denton:

Enclosed for filing with the Commission are three originals and nineteen copies of Philadelphia Electric Company's Second Amendment to its May 30, 1984 Application for Amendment of Facility Operating License DPR-56. This Amendment revises the application by providing additional thermal hydraulic specifications as requested by the NRC Staff.

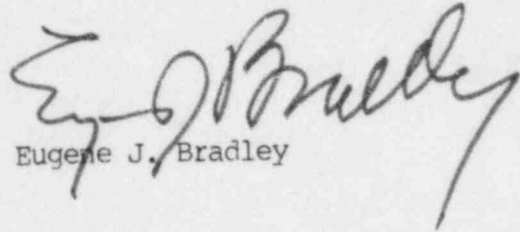
Pursuant to Section 50.91 of the Commission's regulations, it is hereby requested that the license amendment requested in the Company's May 30, 1984 Application, as amended, be issued without prior notice and opportunity for hearing. The May 30, 1984 application requested an amendment to the Peach Bottom Unit 3 Technical Specifications to permit full power operation at higher core flows. When the application was filed, it was anticipated that the current core flow limitations, unless modified as requested in the Application, would require a derating of Peach Bottom Unit 3 in September 1984. In August, 1984, the Staff requested Philadelphia Electric Company to amend its May 30 Application to address certain thermal hydraulic issues, and on September 12 the Staff requested a further amendment to the May 30 Application to incorporate further thermal hydraulic specifications. Unit 3 is presently operating at approximately 98% of its rated capacity and will continue to operate at reduced capacity until a license amendment authorizing operation at increased core flows is issued. Philadelphia Electric Company estimates that the accumulated cost of replacement power resulting from the operation of Unit 3 at reduced power levels will reach \$1 million by mid-November 1984.

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In view of the foregoing, Philadelphia Electric Company hereby requests that the amendment requested in its May 30, 1984 application, as amended, be issued as expeditiously as practicable, without prior notice and opportunity for a hearing.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Eugene J. Bradley". The signature is written in dark ink and is positioned above the printed name.

Eugene J. Bradley

FJB:pkc

Enclosures

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

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

SECOND AMENDMENT TO MAY 30, 1984

APPLICATION FOR AMENDMENT

OF

FACILITY OPERATING LICENSE

DPR-56

Edward G. Bauer, Jr.  
Eugene J. Bradley

2301 Market Street  
Philadelphia, Pennsylvania 19101

Attorneys for  
Philadelphia Electric Company

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of :  
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SECOND AMENDMENT TO MAY 30, 1984

APPLICATION FOR AMENDMENT

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FACILITY OPERATING LICENSE

DPR-56

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On May 30, 1984, Philadelphia Electric Company, Licensee of Facility Operating License DPR-56 for Peach Bottom Unit 3, submitted an Application for Amendment of the License which requested that the Technical Specifications contained in Appendix A of the Operating License be amended by making certain changes to allow operation of Peach Bottom Unit 3 in the increased core flow mode.

By letter dated July 17, 1984 (S. L. Daltroff, PECO to J. F. Stolz, NRC), Philadelphia Electric Company provided additional information requested by the NRC staff concerning the implementation of General Electric Company SIL-380, Rev. 1, BWR Core Thermal Hydraulic Stability, dated February 4, 1984.

On August 10, 1984, in a telephone conversation with the NRC project manager, Licensee was requested to amend the aforementioned application by including a Technical Specification to address BWR thermal hydraulic stability. Accordingly, on August 24, 1984 Philadelphia Electric Company amended its Application of May 30, 1984 by establishing power and core flow operating limits when operating in either the single or dual recirculation loop modes. Additionally, the proposed changes require monitoring of, and appropriate response to, APRM and LPRM noise levels when operating at certain high power/low flow conditions identified in the aforementioned SIL-380, Revision 1.

On September 12, 1984, in a telephone conversation with the NRC project manager, Licensee was requested to further amend its Application by incorporating additional thermal hydraulic specifications. Accordingly, Philadelphia Electric Company, Licensee under Facility Operating License DPR-56 for Peach Bottom Atomic Power Station Unit 3, hereby further amends its Application by revising certain sections as indicated by a vertical bar in the margin of the attached pages iv, 149, 149a, 149b and 164d. Page 149c is added to accommodate a redistribution of material. Changes to pages 10 and 160 proposed



in the August 24, 1984 Amendment and changes proposed in the May 30, 1984 Application remain unchanged by this Amendment Application.

The proposed changes add the requirement to perform core plate differential pressure noise monitoring during single recirculation loop operation, and modify the operability and surveillance requirements associated with APRM and LPRM neutron flux noise monitoring.

#### Significant Hazards Consideration Determination

The proposed changes involve additional surveillance and operating restrictions which minimize the possibility of core thermal hydraulic instability. These changes are being proposed in accordance with guidance received from the Division of Licensing of the Nuclear Regulatory Commission during the September 12, 1984 telephone conversation.

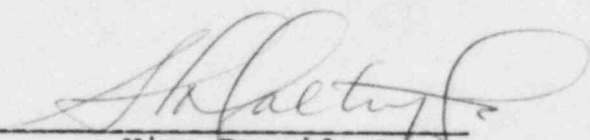
The Commission has provided guidance concerning the application of the standards for determining whether license amendments involve no significant hazards consideration by providing certain examples (48 FR 14870). Example (ii) is a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications. The changes proposed by this application fit this example of actions not involving a significant hazards consideration.

Consequently, Licensee has concluded, in accordance with NRC Guidance (48 FR 14870) and the provisions of Section 50.92 of the Commission's regulations, that these changes do not constitute 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 Operating 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

By:   
Vice President

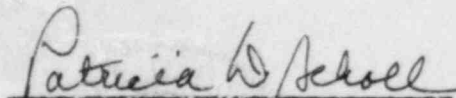
COMMONWEALTH OF PENNSYLVANIA :  
COUNTY OF PHILADELPHIA : SS.  
:

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.



Subscribed and sworn to  
before me this 21<sup>st</sup> day  
of September 1984



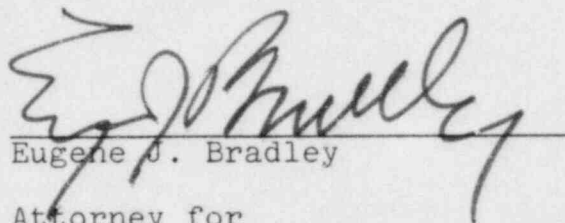
Notary Public

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



CERTIFICATE OF SERVICE

I certify that service of the foregoing Amendment 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 27th 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