

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

August 5, 1992

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

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

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Technical Specifications Change Request 90-14

Dear Sir:

Philadelphia Electric Company (PECo) hereby submits Technical Specifications Change Request (TSCR) No. 90-14, in accordance with 10 CFR 50.90, requesting a change to Appendix A of the Peach Bottom Facility Operating Licenses. The proposed changes incorporate recommendations specified in NRC Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions".

Attachment 1 to this letter describes the proposed changes, and provides justification for the changes. Attachment 2 contains the revised Technical Specification pages.

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

Very truly yours,



G. J. Beck, Manager
Licensing Section

Enclosures: Affidavit, Attachment 1, Attachment 2

cc: T. T. Martin, Administrator, Region I, USNRC
J. J. Lyash, USNRC Senior Resident Inspector, PBAPS
W. P. Dornsife, Commonwealth of Pennsylvania

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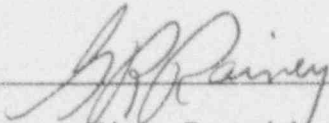
COMMONWEALTH OF PENNSYLVANIA:

: ss.

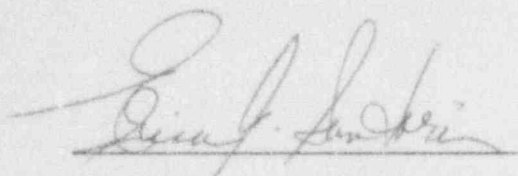
COUNTY OF CHESTER :

G. R. Rainey, being first duly sworn, deposes and says:

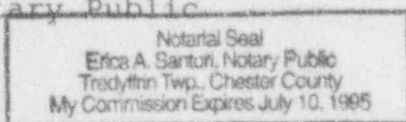
That he is Vice President of Philadelphia Electric Company; the Applicant herein; that he has read the attached Technical Specifications Change Request (Number 90-14) for Peach Bottom Facility Operating Licenses DPR-44 and DPR-56, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.


Vice President

Subscribed and sworn to
before me this 5th day
of August 1992.



Notary Public



ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

TECHNICAL SPECIFICATION CHANGE REQUEST
90-14

"Change to the Technical Specifications to Incorporate
the Recommendations of NRC Generic Letter 90-09"

Supporting Information for Changes 4 Pages

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

Philadelphia Electric Company (PECo), Licensee under Facility Operating Licenses DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, requests that the Technical Specifications (TS) contained in Appendix A of Operating Licenses Nos. DPR-44 and DPR-56 be amended as proposed herein to incorporate the recommendations of NRC Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions." GL 90-09 recommends that licensees implement the alternate TS surveillance requirements for visual inspections of snubbers.

We request that the proposed changes be approved no later than September 13, 1992 for the PBAPS, Unit 2 refueling outage which will include visual snubber inspections.

This change request provides a discussion and description of the proposed TS change, a safety discussion of the proposed TS change, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

Discussion and Description of the Proposed Changes

NRC GL No. 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990, encourages licensees to implement the alternate TS surveillance requirements for visual inspection of snubbers as discussed in the GL. As stated in the GL, the staff has developed an alternate schedule for visual inspection of snubbers that maintains the same snubber operability confidence level as the existing inspection schedule and will generally allow the licensee to perform visual inspections and corrective actions during plant outages. We have reviewed this NRC alternate schedule and have chosen to request changes to the PBAPS, Units 2 and 3 TS.

Existing TS requirements for the visual inspection of snubbers are based on an eighteen (18) month refueling cycle and stipulate that the schedule for visual inspection be determined by the number of inoperable snubbers found during the previous visual inspection.

However, the alternate inspection schedule proposed in GL 90-09 is based on a twenty-four (24) month refueling cycle and the number of inoperable snubbers found during the previous inspection in proportion to the sizes of the snubber population or snubber categories. Furthermore, the NRC indicated that since this line-item TS improvement will reduce future occupational radiation exposure and is highly cost effective, the alternate inspection schedule proposed in GL 90-09 is consistent with the NRC's policy statement on TS improvements. Therefore, the proposed changes to

the PBAPS, Units 2 and 3 TS are requested in order to realize the benefits identified in GL 90-09.

Safety Discussion

The proposed TS changes are in accordance with the recommendations specified in GL 90-09.

PBAPS will comply with the guidance in the GL by visually inspecting the snubber population, irrespective of type (i.e., same design and manufacturer, irrespective of capacity). PBAPS intends to generally inspect the snubber population either as one large population or in two groups based on accessibility. As stated in the GL, snubbers may be categorized as accessible or inaccessible based upon their accessibility during power operation.

The performance of visual inspections of snubbers is a separate process that complements the snubber functional testing program and provides additional confidence of snubber operability. The alternate schedule developed by the NRC is based on 1) the number of inoperable snubbers found during the previous inspection, 2) the total population or category size, and 3) the previous inspection interval. Furthermore, the alternate inspection interval is compatible with a twenty-four (24) month refueling cycle. The NRC has evaluated this alternate schedule and concluded that it maintains the same snubber operability confidence level as that currently provided in the TS.

We agree with the NRC's conclusion that this alternate schedule will maintain the same confidence level, and therefore will not impact the determination or assurance of snubber operability. This proposed change does not involve a physical change to any plant equipment and will not result in an increased probability of a malfunction of equipment that is affected by snubber performance.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that these proposed changes to the PBAPS, Units 2 and 3 TS do not constitute a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

- 1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Implementing the recommendations in GL 90-09 will not introduce any new failure mode and will not alter any

assumptions previously made in evaluating the consequences of an accident since the same confidence level exists for ensuring snubber operability. The proposed changes do not affect limiting safety system settings or operating parameters, and do not modify or add any accident initiating events or parameters. Therefore, the proposed changes do not cause an increase in the probability or consequences of an accident previously evaluated.

- 2) The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed changes to the PBAPS, Units 2 and 3 TS for implementing the recommendations of GL 90-09 do not involve any physical alterations to plant equipment, changes to setpoints or operating parameters, nor does it involve a potential accident initiating event. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 3) The proposed change does not involve a significant reduction in the margin of safety.

The proposed changes maintain the same confidence level as that currently provided by the TS for determining snubber operability. Accordingly, the existing margin of safety will be maintained. Therefore, the proposed change does not involve a reduction in a margin of safety.

Information Supporting an Environmental Assessment

An environmental assessment is not required for the changes proposed by this TSCR since the requested changes conform to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22(c)(9). The requested changes will have no impact on the environment. The proposed changes do not involve a significant hazards consideration as discussed in the preceding section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the proposed changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the PBAPS, Units 2 and 3 TS and have concluded that the changes do not involve an unreviewed safety question and will not endanger the health and safety of the public.