

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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June 22, 1992

Docket Nos. 50-277

50-278

License Nos. DPR-44

DPR-56

NUCLEAR ENGINEERING & SERVICES DEPARTMENT

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 88-08,
Supplement 1

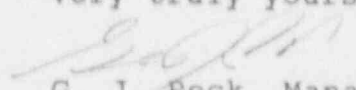
Dear Sir:

Philadelphia Electric Company (PECo) hereby submits Technical Specifications Change Request (TSCR) No. 88-08, Supplement 1, in accordance with 10 CFR 50.90, requesting a change to Appendix A of the Peach Bottom Facility Operating Licenses. The proposed change concerns the early phasing in of elimination of immediate and daily testing requirements when a Diesel Generator (DG) is out of service for scheduled preplanned maintenance. The E-1 DG is scheduled to be removed from service for its planned annual maintenance inspection on July 13, 1992 and it is requested that this change request be evaluated and approved to support this schedule. Further, because of the large number of new tests that must be generated and approved to implement the changes requested by the original TSCR 88-08 (January 31, 1992) it is requested that the remaining changes not be made effective until January 1, 1993. This supplement will implement one element of the original change request which will improve the reliability and availability of the DGs.

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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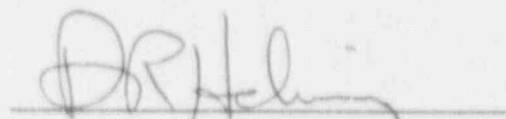
COMMONWEALTH OF PENNSYLVANIA:

: SS.

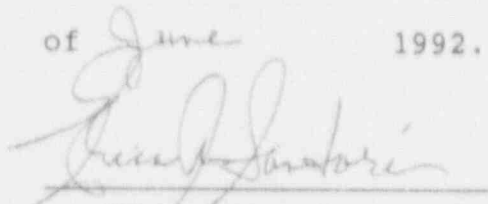
COUNTY OF CHESTER :

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 Technical
Specifications Change Request (Number 88-08, Supplement 1) 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 ^{22nd} day
of June 1992.



Notary Public
Ernest A. Santon, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires July 10, 1995

ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

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TECHNICAL SPECIFICATION CHANGE REQUEST
88-08, Supplement 1

"Elimination of Immediate and Daily Testing of
Emergency Diesel Generators when One Diesel Generator
is Out of Service for Preplanned Scheduled Maintenance"

Supporting Information for Changes 3 Pages

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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 Technical Specifications contained in Appendix A to the Operating Licenses be amended. Proposed changes to the Technical Specifications are indicated by vertical bars in the margin of page 132. The proposed revised pages 132 for each unit are included in Attachment 2.

Description of Changes

In view of the current schedule of near term DG routine maintenance outages there is a high level of interest in phasing in the elimination of immediate and daily testing (Technical Specification 4.5.F.1) of the remaining Diesel Generators (DG) when one DG is removed from service for preplanned, preventative maintenance or testing (i.e. annual maintenance inspection). Technical Specification 4.5.F.1 currently states: "When it is determined that one diesel generator is inoperable, the operable diesel generators shall be demonstrated to be operable immediately and daily thereafter.". The proposed TS Section 4.5.F.1 is adapted from the TSCR 88-08 and would state: "If a diesel generator becomes inoperable for any other reason other than preplanned preventative maintenance or testing, the operable diesel generators shall be demonstrated to be operable immediately and daily thereafter.". This change is being requested to improve the reliability of the DG and to provide relief from the immediate and daily testing requirements. PECO submitted a Technical Specification Change Request (TSCR) which among other changes would eliminate the immediate and daily testing requirement (TSCR 88-08, January 31, 1992). Due to the complexity of TSCR 88-08 it is impractical to phase in this portion of the TSCR 88-08 by changing the effective dates for pages corresponding to this change. This TSCR supplements TSCR 88-08 and is being processed to facilitate the implementation of this one feature of the total TSCR 88-08 submittal. Approval of this single change is requested to delete unnecessary immediate and daily testing during the next DG maintenance outage; currently scheduled to begin on July 13, 1992. Two additional DG outages are scheduled for this year.

Safety Discussion

This change will eliminate testing of the remaining DGs only during preplanned preventative maintenance or testing; if a DG is discovered to be inoperable for some other reason the remaining DGs will be tested to assure they are operable and no common mode failure exists. The proposed change will improve the reliability of the DG by eliminating unnecessary and excessive testing. The operating history of the DGs indicate a high degree of reliability and the normal surveillance tests provide a high degree of

assurance that the DGs will operate when required. Reliability and availability of the DGs is increased by the elimination of excessive DG Testing which removes a DG from service for testing and imposes unnecessary wear. The "excessive DG testing" eliminated by this TSCR includes:

- the initial immediate demonstration of DG operability by starting the DG when another DG is made inoperable for preplanned preventative maintenance or testing; and
- repeating DG operability demonstrations by starting each DG every 24 hours as long as a DG is out of service for preplanned preventative maintenance or testing.

The basis for eliminating "excessive DG testing" is that none of the conditions which mandate DG testing are indicative of a potential DG failure. Moreover, the normal TS surveillance testing schedule provides adequate assurance that the DGs will be capable of performing their intended safety function. Hence, the immediate and daily testing adds little value while subjecting the DGs to unnecessary wear. This change will not affect the proposed TSCR 88-08.

No Significant Hazards Consideration

The change proposed in this Application does not constitute a significant hazards consideration in that:

- i) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because the probability of a Loss of Off Site Power (LOOP) event is independent of the testing or availability of any of the Diesel Generators. The DGs mitigate the consequences of an accident; therefore, by increasing their availability the consequences of an accident are going to be less severe.
- ii) The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated because this change does not add any accident initiators or make any modifications which could create the possibility of a new or different type of accident. The only change proposed in this request is the elimination of excessive testing requirements.
- iii) The proposed changes do not involve a significant reduction in a margin of safety because the margin of safety remains the same. The existing analysis assumes that a DG will be out of service for a seven day period. The current ST program provides a high degree of assurance that the DGs will operate when required. The

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immediate and daily testing being eliminated by this request provides no additional assurance. Further, by eliminating the excessive testing requirements the reliability of the remaining DGs is improved and the margin of safety is maintained.

Environmental Assessment

An environmental impact assessment is not required for the changes proposed by this Application because the changes conform to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22(c)(9).

Conclusion

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.