

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

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Philadelphia Electric Company, Licensee under Facility Operating Licenses DPR-44 and DPR-56 for Peach Bottom Atomic Power Station Unit Nos. 2 and 3, respectively, hereby requests that the Technical Specifications Reporting Requirements incorporated into Appendix A of the Operating License be amended in Section 1.0, Definitions, and Section 6.0, Administrative Controls, as requested by Generic Letter No. 83-43, dated December 19, 1983 (D. G. Eisenhut, NRC, to All Licensees). Accordingly, Licensee requests that pages 7, 251, 253, 256, 257, and 260 be revised as indicated by a vertical bar in the margin, and that pages 254b, and 256a be deleted from the Technical

Specifications. Further, Licensee requests that the material on page 255 be deleted, and page 254a be renumbered as page 255.

The proposed revisions and deletions to the Technical Specification Reporting Requirements reflect the revisions to Section 50.72 and the addition of Section 50.73 to the Commission's Regulations. Additionally, the proposed revisions conform to the Standard Technical Specifications enclosed with Generic Letter No. 83-43. The revisions would (1) add the definition of Reportable Events to the Definition Section 1.0, (2) delete the prompt and 30-day reporting specification, since these requirements have been superseded by 10 CFR 50.72 and 50.73, and (3) revise the nomenclature to conform with 10 CFR 50.73.

The requirement to report failure of a primary coolant system safety or relief valve to close was recently incorporated into the prompt notification Specification (6.9.2.a.10) by Amendment Nos. 100 and 102, to Facility Operating Licenses Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station, Unit Nos. 2 and 3. The addition of this reporting requirement was in response to TMI Action Plan item II.K.3.3 (Reporting of Safety and Relief Valve Failures and Challenges). Licensee requests that this reporting requirement be deleted along with the other prompt reporting requirements, since the new rule (10 CFR 50.73) requires reporting of relief valve failures if the condition could have prevented the fulfillment of a safety function and redundant equipment was not operable. This proposal complies with the request of Generic Letter 83-43 to delete license event

reporting requirements from the license and would avoid interpretational conflicts with new rule 10 CFR 50.73. The annual safety-relief valve reporting requirement (Specification 6.9.1.c) would remain in effect.

#### Significant Hazards Consideration Determination

The proposed revisions to the Technical Specification are clarifying in nature and/or made at the request of the Commission. 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). One of the example of actions involving no significant hazards consideration is a change that is purely administrative: for example, a change in nomenclature. The proposed changes of this application fit this example of an action 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 this change does not constitute a significant hazards consideration since it does not:

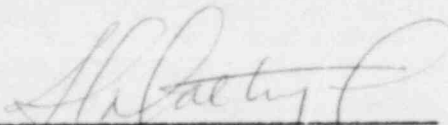
- (1) involve a significant increase in the probability or consequences of an accident previously evaluated or,
- (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or

(3) involve a significant reduction in a margin of safety.

Because this change to the Technical Specification is clarifying and made at the request of the Commission, the Commission stated in Generic Letter No. 83-43 that a license fee is not required.

The Plant Operating Review Committee and the Nuclear Review Board have reviewed this proposed change to the Technical Specifications and have concluded that it does not involve an unreviewed safety question or a significant hazard consideration and will not endanger the health and safety of the public.

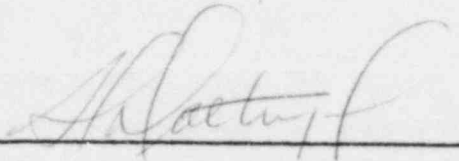
Respectfully submitted,  
PHILADELPHIA ELECTRIC COMPANY

  
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Vice President

COMMONWEALTH OF PENNSYLVANIA :  
COUNTY OF PHILADELPHIA : SS.  
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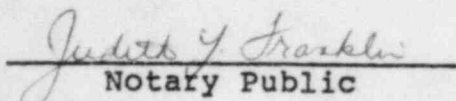
S. L. Daltroff, being first duly sworn, deposes and says:

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.



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Subscribed and sworn to  
before me this 3RD day  
of JANUARY, 1985.



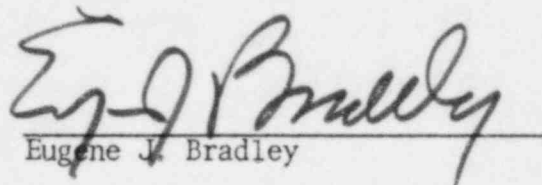
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Notary Public

JUDITH Y. FRANKLIN  
Notary Public, Phila., Phila. Co.  
My Commission Expires July 28, 1987

CERTIFICATE OF SERVICE

I certify that service of the foregoing Second 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 4th day of January, 1985.



Eugene J. Bradley

Attorney for  
Philadelphia Electric Company