



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION SUPPORTING

AMENDMENT NOS. 127 AND 130 TO FACILITY OPERATING

LICENSE NOS. DPR-44 and DPR-56

PHILADELPHIA ELECTRIC COMPANY
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3

DOCKET NOS. 50-277 AND 50-278

1.0 INTRODUCTION

By letter dated August 6, 1981 as supplemented on April 2, 1984, December 2, 1985, October 29, 1986 and July 7, 1987, Philadelphia Electric Company requested an amendment to Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station, Unit Nos. 2 and 3. The amendments in the August 6, 1981 submittal were in the areas of (1) Methods of verifying drywell-suppression chamber vacuum breaker closure, (2) the operability of radiation monitors, (3) the listing of safety related shock suppressors and (4) several changes of an administrative nature to correct errors, to establish consistency and for editorial clarity. By letter dated April 2, 1984 the licensee withdrew the changes in parts (2) and (3) above from the scope of this application. Based on further interactions with NRC staff the licensee further amended the application by letters dated December 2, 1985, October 29, 1986 and July 7, 1987.

The resulting agenda of changes proposed by the licensee in these documents which are acted upon in this amendment are as follows:

- (a) From the August 6, 1981 application; correction of the spelling of the word "greater" on page 128; and the vacuum breaker technical specifications, as amended by the later submittals, on page 171 of the Appendix A Technical Specifications. The licensee's August 6, 1981 submittal also proposed a clarification of the reporting period for submission of a written report on page 51 of the Environmental Technical Specifications in Appendix B to the facility licenses.
- (b) The December 2, 1985 submittal proposed revisions in the vacuum breaker specifications in 3.7.A.4.b on pages 170 and 171; corrected the spelling of "except" in 3.7.A.3.a on page 170; deleted the redundant word "valve" from the term "vacuum breaker valve" in 4.7.A.4.b and c on page 170; deleted the extraneous words "determined to be" from 3.7.A.4.c on page 171; changed the word "will" to "shall" in 3.7.A.4.d on page 171; clarified the event for conducting the

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subject test in 4.7.A.4.d as a "refueling outage" versus the prior term "refueling"; deleted an obsolete and extraneous reference to the initial startup test program and demonstration of electrical output in 3.7.A.5 and added page 171a to accommodate the expansion of the specification 3.7.A text.

- (c) The October 29, 1986 submittal revised the specification 3.7.A.4.b requirement to initiate testing within 8 hours to a requirement to perform testing within 24 hours; consolidated the specification 3.7.A.4.b requirement for periodic testing following initial detection of a "not fully seated" position to include the previous 15 day and 24 hour tests based on whether indication exists that the vacuum breaker is fully seated and eliminated the need for a page 171a.
- (d) The July 7, 1987 submittal again revised the specification 3.7.A.4.b requirement on page 170 back to the form it had in the December 2, 1985 submittal. This change was made in response to the staff's letter dated April 28, 1987.

The NRC staff has published notice of consideration of this amendment in the Federal Register on June 20, 1984 (49 FR 25369) and on January 29, 1986 (51 FR 3716). Those notices reflected the August 6, 1981 and December 2, 1985 submittals. The changes introduced by the October 29, 1986 and July 7, 1987 submittals are within the scope of these notices since the wording of the more significant item, the 3.7.A.4.b testing requirement on page 170, has reverted to the wording for this item in the December 2, 1985 submittal and the provision allowing testing to be extended from once per 15 days to a monthly interval under certain conditions has been deleted.

2.0 EVALUATION

By letter dated December 2, 1985, the licensee revised their earlier proposal (August 6, 1981) for a change in TS 3.7.A.4.b relating to Drywell-Pressure Suppression Chamber Vacuum Breakers (DSVB). The licensee stated that the revised proposal reflected staff's suggestions made during a meeting on February 26, 1985. Specifically, the revised proposal stated that the DSVBs would be considered fully closed even though the "not fully seated" position indication is shown, provided that a leak test is initiated within 8 hours of such detection. This test should confirm that the bypass area between the drywell and the suppression chamber is less than or equivalent to a one-inch diameter hole. Additionally, the revised proposal identified the frequency of followup confirmatory periodic leak tests should a "not fully seated" position indication exist for any DSVB.

Based on review of the revised proposal, the staff by telephone conversation on February 5, 1986, suggested some modifications to the proposed change in the area of follow-up periodic leak tests. In response, the licensee provided a submittal dated October 29, 1986 and

subsequently revised it by a submittal dated July 7, 1987. In summary, the licensee has replaced the TS 3.7.A provision permitting continuous operation with one DSVB in the position between "fully closed" and "3 degrees open" with (a) a requirement for initiation of a bypass area leakage test within 8 hours of detection of a "not fully seated" position indication (December 2, 1985 and July 7, 1987 submittals), and (b) additional follow-up periodic leak tests to ensure that (1) testing is performed within 24 hours following DSVB exercising required by surveillance requirement 4.7.A.4.a or b and (2) the time interval between any two consecutive tests, including the initial test, is not to exceed 15 days.

The staff has reviewed the licensee's proposed changes to Peach Bottom Units 2 and 3 TS 3.7.A.4.b as given in the above submittals and the associated justification. Based on the review, the staff finds the proposed approach for considering the DSVBs to be "fully seated," i.e., confirming that the bypass area is less than or equal to the area corresponding to a one-inch diameter hole by leak tests, to be acceptable. This is because, the proposed approach assures that the bypass leakage following an accident would be less than the maximum allowable bypass leakage. Additionally, the staff finds that the proposed change will allow the licensee greater operational flexibility than what is currently available in the sense that with the change, more than one DSVB can be "not fully seated" as shown by the corresponding position indications. However, acceptance is based on the initial and periodic leak tests confirming that the limiting value for the bypass area mentioned above is not exceeded. The staff also finds that the proposed initial and periodic confirmation leak tests provide reasonable assurance that the DSVBs will not be open in excess of the limiting bypass area, when they are required to remain closed.

Based on the above, the staff concludes that the licensee's proposed changes to TS 3.7.A.4.b, 3.7.A.4.c, 3.7.A.4.d, 4.7.A.4.b, c and d for Peach Bottom, Units 2 and 3, are acceptable. Acceptance is based, particularly, on the staff's finding that with the proposed change, the maximum bypass leakage following an accident should be less than the maximum allowable bypass leakage. The staff further finds the minor changes to TS 3.7.A, 4.7.A on TS pages 170 and 171, the change on page 128 and the change on page 51 of the Appendix B TS serve to correct errors, to establish consistency, to provide editorial clarity and do not change the intent of the TS. These changes are, therefore, acceptable.

3.0 ENVIRONMENTAL CONSIDERATIONS

These amendments involve a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or

cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement nor environmental assessment need be prepared in connection with the issuance of the amendments.

4.0 CONCLUSION

The Commission made a proposed determination that the amendments involve no significant hazards consideration which was published in the Federal Register (49 FR 25369) on June 20, 1984 and (51 FR 3716) on January 29, 1986 and consulted with the State of Pennsylvania. No public comments were received and the State of Pennsylvania did not have any comments.

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: February 18, 1988