



PECO NUCLEAR

A Unit of PECO Energy

Station Support Department

10 CFR 50.90

PECO Energy Company
965 Chesterbrook Boulevard
Wayne, PA 19087-5191

February 4, 1998

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
License Change Application ECR 96-02071

Dear Sir:

PECO Energy Company (PECO Energy) hereby submits License Change Application ECR 96-02071, in accordance with 10 CFR 50.90, requesting a change to the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3 Facility Operating Licenses. This proposed change will revise Technical Specifications (TS) Surveillance Requirement 3.6.4.1.2 concerning Secondary Containment doors.

Information supporting this request is contained in Attachment 1 to this letter, and the marked up pages showing the proposed changes to the PBAPS, Units 2 and 3 TS are contained in Attachment 2. We request that this amendment to the PBAPS, Units 2 and 3 TS be approved by August 15, 1998.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

James B. Cotton
Director - Licensing *for*

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Enclosures: Affidavit, Attachment 1, Attachment 2

cc: H. J. Miller, Administrator, Region I, USNRC
A. C. McMurtry, USNRC Senior Resident Inspector, PBAPS
R. R. Janati, Commonwealth of Pennsylvania

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PDR ADOCK 05000277
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COMMONWEALTH OF PENNSYLVANIA:

: SS.

COUNTY OF CHESTER :

J. B. Cotton, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company; the Applicant herein; that he has read the attached License Change Application ECR 96-02071, 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.

John B. Cotton

Vice President

Subscribed and sworn to
before me this *4th* day
of *February* 1998.

Carol A. Walton

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

LICENSE CHANGE APPLICATION
ECR 96-02071

"Secondary Containment Doors"

Supporting Information - 4 Pages

Introduction

PECO Energy Company, 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 to the Operating License be amended to revise Surveillance Requirement (SR) 3.6.4.1.2 and the associated Bases, to reflect changes in requirements for Secondary Containment doors. The TS and Bases pages showing the proposed changes are contained in Attachment 2. This License Change Application provides a discussion and description of the proposed TS changes, a safety assessment of the proposed TS changes, information supporting a finding of No Significant Hazards Conclusion and information supporting an Environmental Assessment.

Discussion and Description of the Proposed Change

TS SR 3.6.4.1.2 currently requires verification that "each secondary containment access door is closed, except when the access opening is being used for entry and exit, then at least one door shall be closed." PECO Energy Company proposes that SR 3.6.4.1.2 be revised to verify "that either all inner or all outer secondary containment access doors are closed in each air lock." This change will result in greater flexibility in performing maintenance on the Secondary Containment doors and greater flexibility in moving materials in and out of Secondary Containment. Currently, maintenance of the Secondary Containment doors requires declaring the Secondary Containment inoperable and entering a four (4) hour action statement. Failure to complete the maintenance within the four (4) hours would require the plant to be in Mode 3 within 12 hours, and Mode 4 within 36 hours. Entering Mode 3 or 4 for Secondary Containment door maintenance results in undue hardship without any significant benefit in safety.

Safety Assessment

As stated in the PBAPS, Units 2 and 3 Updated Final Safety Analysis Report (UFSAR) (Section 5.3, "Secondary Containment System"), the safety objective of the reactor building Secondary Containment, in conjunction with other engineered safeguards, is to limit the ground level release of airborne radioactive materials and to provide a means for controlled elevated release of the building atmosphere so that off-site doses from the postulated design basis accidents are below the guideline values of 10 CFR 100. In order to maintain this safety objective, the reactor building has personnel and equipment entrances. The entrances are provided with airtight doors forming an air lock system to maintain the leak-tightness of the building. The proposed TS will maintain this safety objective of the Secondary Containment.

As stated above, PECO Energy Company proposes that TS SR 3.6.4.1.2 be revised to verify "that either all inner or all outer secondary containment access doors are closed in each air lock." During the times that one or more inner (or outer) doors are open, the closed outer (or inner) doors will serve as the Secondary Containment barrier. Allowing certain inner or outer Secondary Containment doors to be open does not compromise the safety objective of the Secondary Containment since no commitment is made in the PBAPS, Units 2 and 3 UFSAR to consider the single failure of passive

structural components such as Secondary Containment doors. As discussed in Section 1.5 of the UFSAR, "... Essential safety actions shall be carried out by equipment of sufficient redundancy and independence that no single failure of active components can prevent the required actions". The same UFSAR section goes on to state that, "For systems or components to which IEEE-279 (1968) is applicable, single failures of passive electrical components are considered, as well as single failures of active components, in recognition of the higher anticipated failure rates of passive electrical components relative to passive mechanical components." Therefore, based on this UFSAR discussion, it is concluded that failure of outer (inner) secondary containment doors need not be postulated with an inner (outer) door being open.

Controls exist to ensure that Secondary Containment is maintained. Blue lights provide visual warning if either an inner or outer barrier in an air lock is open (a barrier is usually comprised of a single door, but in some cases two doors are provided). This supervisory electrical system also alarms upon a condition where both an inner and outer barrier are open in any air lock. The alarms consist of a Control Room alarm and local audible alarms. The Alarm Response Card (ARC) for this alarm requires that personnel be dispatched to close doors if the alarm has not cleared. This supervisory system is tested periodically. Procedures also exist which specify the administrative requirements for the extended opening of any Secondary Containment access door.

In addition, a Secondary Containment capability (draw down) test is performed with the Standby Gas Treatment System once per cycle on each unit. This test verifies the capability to maintain Secondary Containment with only inner or only outer doors closed in each air lock, thus testing the capability of only inner and then only outer doors.

This change will not result in greater or more frequent loading of Secondary Containment doors, and does not result in changes that impact the reliability of the Secondary Containment and the Standby Gas Treatment System.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed change to the PBAPS, Units 2 and 3 TS, which will revise TS SR 3.6.4.1.2, does not involve 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 TS changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

TS SR 3.6.4.1.2 will be revised to require either all inner or outer secondary containment access doors to be closed in each air lock. This revision will not adversely affect the ability of the Secondary Containment to mitigate the radiological consequences of a Loss-of-Coolant Accident or fuel handling accident, and does not involve a significant increase in the probability or consequences of an accident previously evaluated. During those times that one or more inner (or outer) doors are open, the closed outer (or inner) doors will serve as the Secondary Containment boundary. Allowing certain inner or outer Secondary Containment access doors in an air lock to be open does not

compromise the design of the Secondary Containment. No commitment is made in the UFSAR to consider the single failure of passive structural components such as Secondary Containment doors. As discussed in Section 1.5 of the UFSAR, "... Essential safety actions shall be carried out by equipment of sufficient redundancy and independence that no single failure of active components can prevent the required actions". The same UFSAR section goes on to state that, "For systems or components to which IEEE-279 (1968) is applicable, single failures of passive electrical components are considered, as well as single failures of active components, in recognition of the higher anticipated failure rates of passive electrical components relative to passive mechanical components." Therefore, based on this UFSAR discussion, it is concluded that failure of outer (inner) secondary containment doors need not be postulated with the inner (outer) door being open.

The performance of the Secondary Containment and the Standby Gas Treatment System is unaffected by this activity. Surveillance testing will prove the capability to maintain Secondary Containment with only inner or only outer doors closed. This change will not result in greater or more frequent loading of Secondary Containment doors, and does not result in changes that impact the reliability of the Secondary Containment and the Standby Gas Treatment System.

2. The proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The Secondary Containment, in conjunction with the Standby Gas Treatment System, provides the means for mitigating the radiological consequences of an accident. The configuration of the Secondary Containment has no effect on accident initiators which lead to a new or different kind of accident. This change will not involve any changes to plant systems, structures, or components which could act as new accident initiators. The design, function, and reliability of Secondary Containment and the Standby Gas Treatment System are also not impacted by this change. Therefore, this change will not create the possibility of a new or different kind of accident from any previously evaluated.

3. The proposed TS changes do not involve a significant reduction in a margin of safety.

No margins of safety are reduced as a result of this change to the TS. No safety limits will be changed as a result of this TS change. The Secondary Containment will continue to perform its intended safety function of limiting the ground level release of airborne radioactive materials and to provide a means for controlled elevated release of the building atmosphere so that off-site doses from the postulated design basis accidents are below the limits of 10 CFR 100. The design and reliability of the Secondary Containment are also not impacted as a result of this change.

Information Supporting an Environmental Assessment

An environmental assessment is not required for the proposed changes since the proposed changes conform to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22(c)(9). The proposed 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 this proposed change to the PBAPS, Units 2 and 3 TS and have concluded that it does not involve an unreviewed safety question, and will not endanger the health and safety of the public.