

## PHILADELPHIA ELECTRIC COMPANY

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March 10, 1989

Docket Nos. 50-277  
 50-278

License Nos. DPR-44  
 DPR-56

U.S. Nuclear Regulatory Commission  
 ATTN: Document Control Desk  
 Washington, D. C. 20555

SUBJECT: Peach Bottom Atomic Power Station Request for Expedited Review  
 and Issuance of Technical Specification Change Request dated  
 March 10, 1989

- REFERENCE: 1) Letter from G. A. Hunger, Jr. (PECo) to USNRC dated  
 March 10, 1989
- 2) Licensee Event Report No. 2-89-01 dated February 22, 1989  
 for Peach Bottom Atomic Power Station Units 2 and 3

Dear Sir:

This letter is to request that the NRC expeditiously review and issue Technical Specification Change Request 89-02, "SRM/IRM Calibration-Detector Not in Startup Position," for Peach Bottom Units 2 and 3. The purpose of the change request is to revise the calibration frequencies for the SRM and IRM Detector Not in Startup Position instrument channels for control rod block actuation.

The existing surveillance requirements in Section 4.2.C of the Technical Specifications require calibration of these instrument channels prior to Startup or Control Shutdown. Calibration of the subject instrumentation channels requires personnel entry into the drywell. This action is prohibited by the environment inside containment during operation: high temperature, inerted atmosphere, and high radiation levels. The proposed technical specification change request is to remove the requirement for calibration of those instrument channels. This request is consistent with the Standard Technical Specifications for General Electric Boiling Water Reactors NUREG-0123, vendor recommendations, past surveillance history and preventive maintenance.

The technical specification change request has evolved from a condition of non-compliance discovered on January 20, 1989 for the IRM channels, January 23, 1989 for the SRM channels and reported in Licensee Event Report No. 2-89-01, dated February 22, 1989. Prior to the discovery, functional tests of the subject instrument channels were performed in place of the required calibration. The LER indicated that we would pursue the option of seeking a revision to the technical specifications. We contacted a number of other nuclear utilities to determine if they had a similar provision in their technical specifications, and, if so, how they provided the calibration prior to controlled shutdown. Based on these contacts, we

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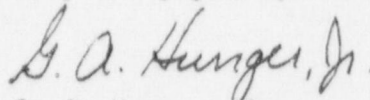
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have concluded a change to our technical specifications is necessary. Except for the time taken to arrive at this conclusion, the proposed technical specification change has been prepared in an expeditious manner and thoroughly reviewed by the Plant Operations Review Committee and Nuclear Review Board prior to submittal on March 10, 1989.

An expedited review and issuance of the technical specification change by the NRC is required to support the Peach Bottom Unit 2 power ascension activities, tentatively scheduled to begin mid April 1989. The instrument channel calibration can be performed prior to the initial startup; however, once in power ascension, operations would be unable to comply with the existing surveillance requirements if plant conditions require a controlled shutdown.

If you have any questions or require additional information, please contact us.

Very truly yours,



G. A. Hunger, Jr.  
Director  
Licensing Section  
Nuclear Support Division

cc: W. T. Russell, Administrator, Region I, USNRC  
T. P. Johnson, USNRC Senior Resident Inspector  
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