



NEI 99-04 (SECY 00-0045)

CCN: 23-07
January 27, 2023

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Peach Bottom Atomic Power Station (PBAPS), Units 1, 2, and 3
Facility Operating License No. DPR-12
Subsequent Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-171, 50-277 and 50-278

Subject: Annual Commitment Revision Report for the Period 01/01/22 through 12/31/22

Pursuant to SECY-00-0045 (NEI 99-04), enclosed is the 2022 Annual Commitment Revision Report. There are no new regulatory commitments contained in this transmittal. If you have any questions or require additional information, please contact Tim Grimme at 717-456-4951.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Henry".

David A. Henry
Site Vice President
Peach Bottom Atomic Power Station

cc: NRC Regional Administrator - NRC Region I
NRC Project Manager, NRR - PBAPS
NRC Senior Resident Inspector - PBAPS
W. DeHass, Commonwealth of Pennsylvania

Enclosure - 2022 Annual Commitment Revision Report

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**PEACH BOTTOM ATOMIC POWER STATION UNITS 1, 2, AND 3
DOCKET NOS. 50-171, 50-277, and 50-278**

**COMMITMENT REVISION REPORT
JANUARY 1, 2022 THRU DECEMBER 31, 2022**

Enclosure - 2022 Annual Commitment Revision Report

Commitment Source: PBLR Application, Appendix A Section A.2.9 and Appendix B Section B.2.9

Constellation Tracking Nos.: T04342 (02701330-64) - REVISED

Nature of Commitment: Peach Bottom License Renewal Application (LRA), Appendix A and B, identified the activities that are credited for compliance with the license renewal rule for aging management of passive, long-lived components and structures within the scope of license renewal.

Summary of Justification: A recurring activity to perform sprinkler head inspections for SSCs in service greater than 50 years has been revised. Station Engineering and Fire Protection Program staff completed a technical evaluation (EC 635066) to change the fire protection program. The evaluation included results from completed sprinkler inspections over the last 6 years and industry operating experience reports. No other FPP aging management activities were revised.

PBAPS UFSAR, Appendix Q, Revision 26, Section Q.2.9
PBAPS UFSAR, Appendix R, Revision 28, Section R.2.1.17

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Commitment Source: PBLR Application, Appendix A, Section A.1.10 and Appendix B, Section B.1.10

Constellation Tracking Nos.: T04325 (02701330-48) - REVISED

Nature of Commitment: Aging management activities credit the primary containment leakage rate testing program for aging management of pressure boundary piping and components in a wetted gas environment due to loss of material in the containment atmosphere control and dilution, RHR and Primary Containment Isolation Systems.

Summary of Justification: Per 10 CFR 50.69 and PBAPS UFSAR Change 2021-0023, Containment Atmosphere Control and Dilution valves categorized as Risk Informed Safety Classification (RISC) RISC-3 are subject to second license renewal aging management program R.2.1.25, inspection of internal surfaces in miscellaneous piping and ducting, and are excluded from this aging management program.

PBAPS UFSAR Appendix Q, Sections Q.0, Q.1.10
PBAPS UFSAR Appendix R, Section R.1.0

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Commitment Source: LETTER TO NRC 9/6/94

Constellation Tracking Nos.: T04078 (02701330-14) - DELETED

Nature of Commitment: RESPONSE TO RAI REGARDING TSCR 93-24 CONOWINGO TIE LINE

Summary of Justification: These actions were completed in late 1994. The station implemented Improved Technical Specification, NUREG 1433 Volume I & II Revision 3 in 4Q1995 via license amendments 210 & 214 for U2 & U3 respectively. The relocation and incorporation of these actions into TS/TSB, TRM/TRMB and station procedures makes these items regulatory obligations as they are now subject to the requirements of other regulatory change processes and no longer satisfy the definition of a regulatory commitment. Therefore, this commitment has been deleted.

PBAPS Units 2 and 3 procedures: OP-MA-108-107, ST-O-054-951-2, and ST-O-51H-200-2

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Commitment Source: NRC GEN LETTER 89-13 ACTION 8 & PBLR Appendix A, Section A.2.8 and Appendix B, Section B.2.8

Constellation Tracking Nos.: T04200 (02701330-31) & T04333 (02701330-56) - REVISED

Nature of Commitment: PLRA Appendix A, Section A.2.8 and Appendix B, Section B.2.8 credit Generic Letter 89-13 activities for providing aging management for components exposed to raw water for the HPSW, ESW, ECW, RHR heat exchangers; HPSW and CS pump motor oil coolers; RHR, CS, HPCI and RCIC pump room cooling coils; and EDG jacket, air and lube oil coolers are also included.

Summary of Justification: Station Engineering and Chemistry staff evaluated and approved a change regarding application of Asiatic clam biocide. The biocide shall be applied on an as required frequency based on GL 89-13 HX inspections for clams and programmatic monitoring of mussel infestation. The as required application is determined through programmatic performance monitoring and inspection activities performed for the GL 89-13 and Aging Management Programs.

PBAPS Units 2 and 3 procedure: ER-AA-340

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Commitment Source: CTS 4.7.D.1.C and ITS 3.6.1.3 R07

Constellation Tracking Nos.: T03753 (02701382-75) - DELETED

Nature of Commitment: Requirement to Exercise MSIVs by Partial Stroke

Summary of Justification: NRC SER for adoption of license amendments 210 & 214 (ITS) explicitly states: CTS 4.7.D.1.c, requiring exercising of the MSIVs by partial closure and subsequent opening, is being relocated to the IST program and the IST Program implementing procedures. Any changes to plant procedures used to implement the IST Program will be subject to the requirements of 10 CFR 50.59. This requirement to exercise the MSIVs is not required to be in TS to ensure the Operability of the MSIVs since these valves are subject to the stroke test requirements of the IST Program. Implementation of the ASME Code Section XI IST Program is required by 10 CFR 50.55a. MSIV testing requirements are governed by the In-Service Testing Program which is a regulatory obligation and NOT a regulatory commitment. This commitment has been deleted.

PBAPS Units 2 and 3 procedures: ST-O-60F-405-2(3)

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Commitment Source: CTS TABLE 4.2.B and ITS 3.8.1 R07

Constellation Tracking Nos.: T03783 (02701385-01) - DELETED

Nature of Commitment: The 4KV Emergency Power system voltage relays (HGA/SV) will be functionally tested.

Summary of Justification: LOCA LOOP relay testing is a regulatory obligation as mandated by TS SR 3.3.8.1.3 & 3.3.8.1.4. These requirements functionally test individual channels of Loss of Power instruments as well as 4KV emergency bus control logic. These surveillances are a regulatory obligation and do not meet the definition of a regulatory commitment. They are also under the purview of the Surveillance Frequency Control Program and subject to process requirements controlling changes. This commitment has been deleted.

PBAPS Units 2 and 3 procedures: ST-O-052-151-2(3),
ST-O-052-152-2(3), ST-O-052-153-2(3), ST-O-052-154-2(3),
ST-O-054-751-2(3), ST-O-054-752-2(3), ST-O-054-753-2(3),
ST-O-054-754-2(3)

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Commitment Source: PBLR RAI Response NRC Letter 04/29/2002

Constellation Tracking Nos.: T04475 (02701330-81)

Nature of Commitment: PLRA RAIs established commitments to perform Non-EQ Accessible Cable Aging Management activities.

Summary of Justification: The Non-EQ Accessible Cable Aging Management activities visually inspect cables and connections in accessible areas (easily approached and viewed) in potentially adverse localized environments. These areas are Turbine Building and Control Room, Unit 2 and 3 Reactor Building, D/G building, Circ. Water pump structure, Emergency Cooling Tower and Reservoir, and Recombiner Building. The first inspection of the applicable areas was completed prior to the period of extended operation (i.e., prior to August 8, 2013, for Unit 2 and July 2, 2014, for Unit 3). COVID-19 Pandemic isolation policies contributed to delays in inspection completion. Station leadership has approved a one-time due date extension that will result in the inspections being completed approximately 9 months after the ten-year requirement. No change to the commitment has been authorized. The station work management task due date has been extended as approved by station leadership.

PBAPS Units 2 and 3 Preventive Maintenance Task Identification Number: 00194969-57 (U2) and 00201947-15 (U3), (FLR) U/3 NON-EQ ACCESSIBLE CABLE AGING INSPECTION

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Commitment Source: Peach Bottom Atomic Power Station, Unit 2 - Authorization and Safety Evaluation for Alternative Request I5R-14, Revision 1, (EPID L-2022-LLR-0006)

Constellation Tracking Nos.: 02701385-44 – NEW Commitment

Nature of Commitment: ISI: U2 RPV N-16A Half-Nozzle Repair Commitments (VT-2 & UT)

Summary of Justification: ISI Program Required Actions from NRC SER for I5R-14, Revision 1

1. Perform a bare metal VT-2 examination of N-16A location from the OD of the PBAPS, Unit 2 vessel. Each refueling outage during the Class 1 System Leakage Test. Commitment to the NRC.
2. Perform a best-effort UT of the RPV low alloy steel surrounding the Unit 2 N-16A penetration to confirm that the as-left J-groove weld flaw does not propagate into the vessel wall material. During the next refueling outage (P2R24 – complete 2022), and every 10 years thereafter.

PBAPS Units 2 and 3 procedure: ER-PB-330-1005, Peach Bottom Atomic Power Station Units 2 and 3 Augmented Inspection Plan, Fifth Ten-Year Inspection Interval, Rev 3, Appendix AUG-20 N16A Nozzle Repair Examinations

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End of Commitment Change Report