



NEI 99-04 (SECY-00-0045)

CCN: 25-01  
January 31, 2025

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 01/01/24 through 12/31/24

Pursuant to SECY-00-0045 (NEI 99-04), enclosed is the 2024 Annual Commitment Revision Report. The enclosure describes commitments evaluated during the period that were either new, revised, or deleted.

If you have any questions or require additional information, please contact Tim Grimme at 267-533-7218.

Sincerely,

**Bonifanti,  
Martin A.**

Digitally signed by Bonifanti,  
Martin A.  
Date: 2025.01.27 08:46:02  
-05'00'

Martin A. Bonifanti  
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 - 2024 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, 2024 THRU DECEMBER 31, 2024**

Enclosure - 2024 Annual Commitment Revision Report

Commitment Source: Letter to the NRC dated 1/6/78, Regarding Combined Inspection Reports 50-277/ 77-37 50-278/77-37,

Constellation Tracking Nos.: T03072 (02701329-23) – **DELETED**

Nature of Commitment: Peach Bottom response to a non-compliance identified in the subject inspection report regarding the performance of calibration and adjustment of laboratory analysis equipment and the control of chemical reagents used in the performance of sample analysis.

Summary of Justification: A formal procedure was written and developed to provide staff guidance in compliance with 5.1 and 5.3 of ANSI 18.7- 1972 and Section H.1 of Appendix A of USAEC Regulatory Guide 1.33. This has been updated and replaced several times through the history of the station. Current implementing procedure is CY-AA-130-210. The required actions and intent of the commitment has been verified to be met by the action steps of the procedure. Since the CT was implemented in 1978, quality control of commercial nuclear power plant laboratories has been improved under the auspices of ASTM Specification D 1193, Standard Specification for Reagent Water and ASTM Standard E-200-86, Practice for Preparation, Standardization, and Storage of Standard Solutions for Chemical Analysis. Laboratory operations in accordance with these and other industry standards are a licensee obligation under Regulatory Guide 1.33 and the QATR. Therefore, the commitment made in response to the historic inspection report does not satisfy the definition of a regulatory commitment.  
The commitment has been deleted.

PBAPS UFSAR, 7.20.4.6 Coolant Sampling and Analysis

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Commitment Source: Letter to NRC dated 05/27/83, Peach Bottom Atomic Power Station Fire Protection Exemption Requests and Fire Protection Modifications Progress Report (10CFR50, Appendix R)

Constellation Tracking Nos.: T03150 (02701329-33) - **REVISED**

Nature of Commitment: The reference commitment was generated as a response to events that were dispositioned through the station corrective action program.

Summary of Justification: Inspection of select plant areas for transient combustibles has been removed from general procedures for unit start-up. Design analysis PEAFF-0016 documents:

The Off-Gas pipe tunnels do not require the need for a transient combustible free zone based on the lack of combustibles in the area, inaccessibility of the rooms, the transient combustible controls per OP-AA-201-009, redundant components not affected by a fire in this area, and previous NRC approval for lack of detection.

The Outboard MSIV rooms do not require the need for a transient combustible free zone based on the lack of combustibles in the area, inaccessibility of the room, the transient combustible controls per OP-AA-201-009, redundant components not affected by a fire in this area, and previous NRC approval for lack of detection.

The Neutron Monitoring Rooms do not require the need for a transient combustible free zone based on the lack of combustibles in the area, inaccessibility of the room, the transient combustible controls per OP-AA-201-009, and the lack of safe shutdown components in the room. Therefore, the check of these rooms for transient combustibles and commitment will be removed from GP-2-2(3).

Commitment Implementing documents were updated.

OP-AA-201-009 "Control of Transient Combustible Material"  
OP-MA-201-007 "Fire Protection System Impairment Control"  
PBAPS FPP Section 3.2.2, Item 14

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Enclosure - 2024 Annual Commitment Revision Report

Commitment Source: NRC Letter Dated 10/21/97, Completion Date Deferral Related to NRC Bulletin 96-03, "Potential Plugging of ECCS Suction Strainers in BWRs"

Constellation Tracking Nos.: T04269 (02701330-39) - **REVISED**

Nature of Commitment: This commitment generated inspection activities for ECCS suppression pool suction strainers as a part of station planned response to NRC Bulletin 96-03.

Summary of Justification: Subsequent to 1997, large capacity passive suction strainers have been installed on each Residual Heat Removal and Core Spray suction line in the suppression pool, in response to NRC Bulletin 96-03. Tasks for periodic inspection of the strainers were incorporated into the Inservice Inspection (ISI) Program Third interval. A review of the historical inspections has revealed no fibrous foreign material was identified on the strainers in all cases. The review of inspection history and design basis assumptions for the ECCS strainers as it pertains to fibrous insulation material loading shows adequate margin and justification to support the change to the implementing task frequency. The frequency of suction strainer debris inspection tasks has been revised.

PBAPS UFSAR 4.8.5 PBAPS UFSAR RESIDUAL HEAT REMOVAL SYSTEM Summary Description  
PBAPS UFSAR 6.4.3 Core Spray System  
ER-PB-330-1001, PEACH BOTTOM ATOMIC POWER STATION UNITS 2 & 3 ISI PROGRAM PLAN FIFTH TEN-YEAR INSPECTION INTERVAL

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Enclosure - 2024 Annual Commitment Revision Report

Commitment Source: NRC Letter Dated 10/21/97, Completion Date Deferral Related to NRC Bulletin 96-03, "Potential Plugging of ECCS Suction Strainers in BWRs"

Constellation Tracking Nos.: T04270 (02701330-40) - **REVISED**

Nature of Commitment: Programmatic monitoring sludge accumulation on the suppression pool floor in response to NRC BULLETIN 95-02. The task provide assurance that the sludge accumulation rate does not exceed the design basis assumptions used for the fabrication and testing of the large capacity passive ECCS suction strainers.

Summary of Justification: Station Technical Evaluation 681244-07 (AS9 ACIT) has reviewed the design bases calculation for RHR and Core Spray NPSH margin for the respective ECCS pumps. Operational debris is defined consistent with the BWROG recommendations (Inorganic Zinc, Dust/Dirt, Rust Chips, Unqualified Coatings). The conclusion of this technical evaluation is that the debris loading of sludge is maintained below the design basis of the strainers. Tasks for periodic measurement of the suppression pool sludge and cleaning were incorporated into the Inservice Inspection (ISI) Program Third interval. Improved water chemistry control and maintenance has reduced corrosion product debris loading. In addition, a permanent plant modification has been installed and is used during refueling outages to remove and polish suppression pool water. Suppression pool floor sludge accumulation monitoring frequency has been revised.

PBAPS UFSAR 4.8.5 PBAPS UFSAR RESIDUAL HEAT REMOVAL SYSTEM Summary Description  
PBAPS UFSAR 6.4.3 Core Spray System  
ER-PB-330-1001, PEACH BOTTOM ATOMIC POWER STATION  
UNITS 2 & 3 ISI PROGRAM PLAN FIFTH TEN-YEAR INSPECTION INTERVAL

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Enclosure - 2024 Annual Commitment Revision Report

Commitment Source: NRC Letter Dated 08/30/1995, Issuance Of Improved Technical Specifications, PBAPS Unit Nos. 2 and 3

Constellation Tracking Nos.: T03803 (02701385-18) - **DELETED**

Nature of Commitment: A management directive is issued, annually, designating the Shift Supervisor (or during his/her absence, a designated individual) as responsible for the Control Room Command Function.

Summary of Justification: The subject commitment was developed in 1995 as part of the implementation activities when the station converted from Custom Technical Specifications (CTS) to Improved Technical Specification (ITS) License amendments 210 and 214 for Unit 2 & 3 respectively. NUREG 1433 included a more restrictive change outlining Operating Shift Designation of Responsibility. This change added Chapter 5.0, Administrative Controls, Section 5.1.2, "The Shift Supervisor shall be responsible for the control room command function. During any absence of the Shift Supervisor from the control room while the unit is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the Shift Supervisor from the control room while the unit is in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function." This change to the TS makes the command and control function a license obligation and does not satisfy the definition of a regulatory commitment necessitating annual programmatic communication. The commitment has been deleted.

PBAPS Units 2 and 3 Technical Specification Section 5.1.2  
OP-PB-101-111, PEACH BOTTOM OPERATIONS DEPARTMENT

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End of Commitment Change Report