



NEI 99-04 (SECY 00-0045)

January 10, 2014

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  
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 1/1/13 through 12/31/13

Pursuant to SECY-00-0045 (NEI 99-04), enclosed is the 2011 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 D. J. Foss at 717-456-4311.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick D. Navin", written in a cursive style.

Patrick D. Navin  
Plant Manager  
Peach Bottom Atomic Power Station

cc: S. J. Hansell, Senior Resident Inspector, USNRC, PBAPS  
R. R. Janati, Commonwealth of Pennsylvania  
Document Control Desk, USNRC, Washington DC

CCN: 14-01

Attachment

IE 47  
FSMED2  
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***2013 Annual Commitment Revision Report***

**Exelon Nuclear  
Peach Bottom Atomic Power Station**

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

**COMMITMENT REVISION REPORT  
JANUARY 1, 2013 THROUGH DECEMBER 31, 2013**

### **2013 Annual Commitment Revision Report**

Letter Source: Letter to NRC dated 8/31/84 Concerning NRC Inspection 84-20/16

Exelon Tracking No.: T03283

Nature of Commitment: An engineering procedure was revised to require time frames for revising drawings following the completion of plant modifications.

#### **Summary of Justification:**

This commitment is considered as historical and was therefore, deleted from the PBAPS commitment programmatic tracking program. Upgraded industry and PBAPS standards have eliminated the need for detailed tracking of this commitment. The upgraded quality of procedures and site operating practices justifies deletion of this commitment. Therefore, there is no need to track this as a commitment in the commitment tracking program.

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Letter Source: Letter to NRC dated 1/29/90 - Response to NRC Generic Letter 89-13

Exelon Tracking No.: T04021

Nature of Commitment: Preventive maintenance was established to perform quarterly soundings of the intake pump structure to determine accumulated mud levels.

#### **Summary of Justification:**

At the time of this event, the additional programmatic control was warranted to ensure management of mud and silt in the intake pump structure. However, as a result of other NRC commitments involving NRC Generic Letter 89-13 to perform inspections and mud/silt removal of the intake pump structure, it is no longer necessary to perform quarterly soundings. As a result of the routine inspections and silt / mud removal, only minimal silt typically exists in these intake areas throughout the operating cycle. Therefore, this commitment is considered to be historical in nature. The corrective actions taken were effective and the station is in compliance with NRC requirements. There is no longer a need to track this commitment.

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Letter Source: Letter to NRC dated 1/7/02 and NRC Safety Evaluation Report for License Renewal (NUREG-1769)

Exelon Tracking No.: T04330

Nature of Commitment: Analysis has shown that Boraflex® will perform its intended function if degradation is maintained less than 10% uniform loss.

#### **Summary of Justification:**

As a result of modifications to install neutron absorbing inserts into the fuel pool cells, this commitment is no longer necessary. The NRC has reviewed and approved this modification and has issued a license amendment to PBAPS (NRC License Amendment 287/290 and associated Safety Evaluation Report dated 5/21/13). Credit for Boraflex® will only be taken on a limited basis as allowed by the licensing amendment. Interim credit for Boraflex® until all the fuel pool rack inserts are installed was approved by the NRC in the licensing amendment. PBAPS license conditions assure adequate NRC-approved

### **2013 Annual Commitment Revision Report**

controls exist to provide acceptable criticality safety margins. Installation of the neutron absorbing inserts is an improvement to plant safety.

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Letter Source: Letter to NRC dated 1/7/02 concerning PBAPS License Renewal (NUREG-1769)

Exelon Tracking No.: T04333

Nature of Commitment: High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) Room Cooling Coils were to be monitored for a reduction in heat transfer due to flow blockage.

#### **Summary of Justification:**

The High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) Room Cooling Coils are not required for operability of the HPCI and RCIC systems. Therefore, the HPCI and RCIC cooling coils have historically not been deemed to be in the scope of NRC Generic Letter 89-13 activities. The purpose of this commitment change is to clarify the intent of the NRC Generic Letter 89-13 program for the purposes of PBAPS License Renewal. Commitment T04333 was clarified to indicate that the HPCI / RCIC cooling coils are not required for HPCI / RCIC operability and therefore, not required to be monitored. There are no adverse affects on plant safety involved with this activity. This change ensures consistency with the NRC Generic Letter 89-13 and License renewal programs.

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Letter Source: Letter to NRC dated 1/7/02 concerning PBAPS License Renewal (NUREG-1769)

Exelon Tracking No.: T04333

Nature of Commitment: Perform biocide treatments of raw water systems in the scope on NRC Generic Letter 89-13 every six months.

#### **Summary of Justification:**

This commitment was clarified to indicate that the biocide treatments are performed twice per year, not every six months. Not limiting the treatments to every six months enhances the effectiveness of the treatments. The optimal timing of the biocide treatments is to perform them at a raw water temperature of greater than 60°F. Therefore, optimal treatments are performed twice a year when raw water temperatures are above 60°F (typically June – September). This change is viewed as an enhancement to the commitment.

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Letter Source: Letter to NRC dated 1/7/02 involving the License Renewal application to the NRC

Exelon Tracking No.: T04340, T04326, T04339

Nature of Commitment: Perform routine Inspection of High Pressure Coolant Injection (HPCI) system and Reactor Core Isolation Cooling (RCIC) system turbine casing

### **2013 Annual Commitment Revision Report**

and lube oil coolers, HPCI lube oil storage tank, HPCI lube oil system flexible hoses and the HPCI gland seal condenser

#### **Summary of Justification:**

This commitment is being revised to change the frequency of these routine inspections from 10 to 12 years. Based on significant operating experience, it has been determined that a 12 year inspection frequency is sufficient for proactive identification of system component degradation. This change is based on industry and site experience. It was concluded that this change satisfies the intent of the license renewal commitment.

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Letter Source: NRC Order EA-02-0261 dated 1/7/03

Exelon Tracking No.: T04640

Nature of Commitment: NRC Order EA-02-261, Access Authorization Compensatory Measures, references requirements to prevent persons currently denied access at a licensee from gaining access to the protected area of the facility unless the denying licensee reviews the access decision and determines after further review that unescorted access authorization is appropriate, another licensee reviews the conditions under which the denying licensee made the decision, and determines the individual is now trustworthy and reliable and fit for duty, and that escorted access would be appropriate at the current licensee site.

#### **Summary of Justification:**

This commitment is being removed from the commitment tracking program since the NRC order was subsequently rescinded on 11/28/11 and appropriate access controls have been incorporated into NRC rulemaking. PBAPS complies with the NRC access authorization rules. Therefore, there is no need to maintain this item as a commitment.

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Letter Source: NRC Order EA-02-0261 dated 1/7/03

Exelon Tracking No.: T04680

Nature of Commitment: NRC Order EA-02-261, Access Authorization Compensatory Measures, required the licensee to complete required I-9 forms in the timeframe required by the associated INS regulation. A site security procedure implemented this commitment.

#### **Summary of Justification:**

This commitment is being removed from the commitment tracking program since the NRC order was subsequently rescinded on 11/28/11 and appropriate administrative controls have been incorporated into NRC rulemaking. PBAPS complies with the NRC access authorization rules. Therefore, there is no need to maintain this item as a commitment.

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### ***2013 Annual Commitment Revision Report***

Letter Source: Letter to NRC dated 9/14/00 concerning NRC Emergency Telecommunications System

Exelon Tracking No.: T04672

Nature of Commitment: Maintain various NRC Emergency Telecommunications Systems for use during emergencies.

#### **Summary of Justification:**

Modifications to implement the NRC Emergency Telecommunications Systems were completed. This is considered as a regulatory obligation and not a commitment. The regulatory requirements for maintaining an emergency plan and associated NRC emergency communications are governed by 10CFR 50 Appendix E and the PBAPS Emergency Plan. Therefore, there is no need to track this as a commitment in the commitment tracking program.

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End of Commitment Revision Report

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