Exelon Generation

200 Exelon Way
Kennett Square, PA 19348
www.exeloncorp.com

10 CFR 50.90

August 10, 2015

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

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Subject: License Amendment Request to Revise Technical Specifications Section 5.5.12 for Permanent Extension of Type A and Type C Leak Rate Test Frequencies

References: 1) Letter from J. Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request - Revise Technical Specifications Section 5.5.12 for Permanent Extension of Type A and Type C Leak Rate Test Frequencies," dated November 7, 2014

2) E-mail from R. Ennis (U.S. Nuclear Regulatory Commission) to T. Loomis (Exelon Generation Company, LLC), "Draft RAI - Peach Bottom Units 2 and 3 - Primary Containment Leakage Rate Testing Program (TACs MF5172 & 73)," dated March 18, 2015

3) Letter from J. Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information - License Amendment Request to Revise Technical Specifications Section 5.5.12 for Permanent Extension of Type A and Type C Leak Rate Test Frequencies," dated April 13, 2015

In the Reference 1 letter, Exelon Generation Company, LLC (EGC) requested changes to modify the Technical Specifications. The proposed amendment revises the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3 Technical Specification 5.5.12, "Primary Containment Leakage Rate Testing Program" to allow for the permanent extensions of Type A Integrated Leak Rate Testing and Type C Leak Rate Testing frequencies for both Units 2 and 3.

In the Reference 2 e-mail, the U.S. Nuclear Regulatory Commission requested additional information. Reference 3 was our response to this request. Based on further discussions with the U.S. Nuclear Regulatory Commission Staff, Technical Specification page 5.0-17 has been revised to delete the word "exemption" and replace it with the word "exception."

Exelon has reviewed the information supporting a finding of no significant hazards consideration and the environmental consideration provided to the U.S. Nuclear Regulatory Commission in Reference 1. The additional information provided in this response does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration. In addition, the additional information provided in this response does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

Should you have any questions concerning this letter, please contact Tom Loomis at (610) 765-5510.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 10th day of August 2015.

Respectfully,

James Barstow
Director - Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Attachment: Revised Technical Specification Page 5.0-17 (Units 2 and 3)

cc: USNRC Region I, Regional Administrator
USNRC Senior Resident Inspector, PBAPS
USNRC Senior Project Manager, PBAPS
R. R. Janati, Commonwealth of Pennsylvania
S. T. Gray, State of Maryland

Attachment

Revised Technical Specification Page 5.0-17 (Units 2 and 3)

5.5 Programs and Manuals

5.5.11 Safety Function Determination Program (SFDP) (continued)

1. A required system redundant to system(s) supported by the inoperable support system is also inoperable; or

2. A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable; or

3. A required system redundant to support system(s) for the supported systems (b.1) and (b.2) above is also inoperable.

c. The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

5.5.12 Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in NEI 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," Revision 3-A, dated July 2012, and the conditions and limitations specified in NEI 94-01, Revision 2-A, dated October 2008, as modified by the following exception:

a. Section 10.2: MSIV leakage is excluded from the combined total of 0.6 L_a for the Type B and C tests.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 49.1 psig.

The maximum allowable primary containment leakage rate, L_a, at P_a, shall be 0.7% of primary containment air weight per day.

Leakage Rate acceptance criteria are:

a. Primary Containment leakage rate acceptance criterion is $\leq$ 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq$ 0.60 L_a for the Type B and Type C tests and $\leq$ 0.75 L_a for Type A tests;

(continued)

5.5 Programs and Manuals

5.5.11 Safety Function Determination Program (SFDP) (continued)

1. A required system redundant to system(s) supported by the inoperable support system is also inoperable; or

2. A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable; or

3. A required system redundant to support system(s) for the supported systems (b.1) and (b.2) above is also inoperable.

c. The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

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The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 49.1 psig.

The maximum allowable primary containment leakage rate, L_a, at P_a, shall be 0.7% of primary containment air weight per day.

Leakage Rate acceptance criteria are:

a. Primary Containment leakage rate acceptance criterion is $\leq$ 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq$ 0.60 L_a for the Type B and Type C tests and $\leq$ 0.75 L_a for Type A tests;

(continued)