

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of	:	
	:	Docket Nos. 50-277
PHILADELPHIA ELECTRIC COMPANY	:	50-278

APPLICATION FOR AMENDMENT  
OF  
FACILITY OPERATING LICENSES  
DPR-44 & DPR-56

Edward G. Bauer, Jr.  
Eugene J. Bradley

2301 Market Street  
Philadelphia, Pennsylvania 19101

Attorneys for  
Philadelphia Electric Company

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Philadelphia Electric Company, Licensee under Facility Operating Licenses DPR-44 and DPR-56 for Peach Bottom Atomic Power Station Unit Nos. 2 and 3 respectively, hereby requests that the Technical Specifications contained in Appendix A of the Operating Licenses be amended by revising certain sections as indicated by a vertical bar in the margin of attached pages 35, 47, 132, 139, 165, 227, 228, and 231; and by the addition of page 132a. Pages 228a, and 232 are included due to redistribution of material on the revised pages. A discussion of each of the requested changes is set forth below.

## CHANGE I

It is anticipated that Peach Bottom Unit No. 2 and Unit No. 3 suppression chambers (torus) may need to be dewatered during future refueling outages to accommodate structural improvements and coating repairs to the torus. Such dewatering of the torus renders the LPCI and core spray systems inoperable as defined in sections 3.5.A.1.b and 3.5.A.3.b. Section 3.5.F.4 requires the operability of the LPCI and core spray systems during refueling operations; therefore, dewatering the torus would preclude concurrent refueling operations resulting in an extension of the plant outage. The proposed revision to section 3.5.F.4 adds an additional provision that would permit refueling operations and torus dewatering to be performed in parallel provided adequate core flooding inventory is available, and no operations are being performed which have a potential for draining the reactor vessel.

The basis for this change is provided by the "Standard Technical Specifications for General Electric Boiling Water Reactors", revision of April 1, 1978, section 3.5.4, page 5-8, which states that "the LPCS and LPCI systems and suppression chamber are not required to be operable provided that the reactor vessel head is removed and the cavity is flooded, the spent fuel pool gates are removed, and the water level is maintained with the limits of specification 3.9.8 and 3.9.9. Specification 3.9.8 and 3.9.9 states that "At least (23) feet of water shall be maintained over the top of irradiated fuel assemblies seated within the reactor pressure vessel, and the spent fuel storage pool racks". The value of the parenthesized number may vary because of plant design, as stated in the Standard Technical

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Specifications. The Peach Bottom design provides for a minimum of 21 feet of water over the stored irradiated fuel assemblies.

#### CHANGE II

It is anticipated that the off loading of the entire reactor core prior to in vessel activities may be the most effective means of minimizing in-vessel work and personnel radiation exposure. The proposed changes to section 3.10.B provide for unloading and reloading the core under special conditions without having 3 counts per second (cps) on the source range monitors (SRM). The changes would enable the entire core to be unloaded and reloaded without the need for inserting portable "dunking chamber" monitors and a source, thus reducing the possibility of dropping items into the reactor. During unloading, the required shutdown margin will be assured by the fact that core reactivity is being reduced, and the control rods next to the fuel bearing region will be electrically disabled in the fully inserted position. The changes would also allow bundles to be reinserted to their previous positions immediately adjacent to each source range monitor prior to requiring 3 counts per second on the source range monitors during reloading of the reactor. Operability of the source range monitors would be verified by a functional check prior to the beginning of fuel reloading.

A safety evaluation addressing the subject of the proposed changes to Section 3.10.B is provided in the U.S. Nuclear Regulatory Commission's Safety Evaluation Reports supporting Amendment Nos. 33 and 30 to Facility License Nos. DPR-33 and DPR-52 for the Browns Ferry Nuclear Plant, Unit Nos. 1 and 2 respectively, dated September 13,

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1977; and supporting Amendment No. 66 to Facility License No. DPR-57 for the Hatch Nuclear Plant, Unit No. 1, dated June 12, 1979.

As a consequence of this change, the Licensee proposes that the requirements of Table 3.1.1 regarding the reactor protection system be waived when the reactor is completely defueled.

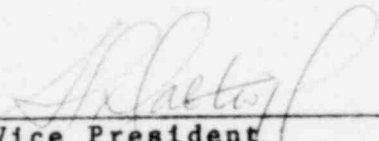
This application requests changes to the Peach Bottom Technical Specifications to establish the core monitoring requirements, and the core flooding and cooling system operability requirements, for ensuring the safe conduct of refueling operations under various plant conditions. The proposed amendment involves a single safety issue having acceptability clearly identified by an NRC position and deemed not to involve a significant hazards consideration; therefore, pursuant to the requirements of 10 CFR 170.22, "Schedule of Fees for Facility License Amendment", Philadelphia Electric Company proposes that this Application for Amendment be considered a Class III Amendment for Unit No. 2 and a Class I for Unit No. 3.

The Plant Operation Review Committee and the Operation and Safety Review Committee have reviewed these changes to the Technical Specifications and have concluded that they do not involve a significant hazard consideration, and will not endanger the health and safety of the public.

Respectfully submitted,

PHILADELPHIA ELECTRIC COMPANY

By

  
Vice President

COMMONWEALTH OF PENNSYLVANIA :  
COUNTY OF PHILADELPHIA : ss.

S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating Licenses and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

S. L. Daltroff

Subscribed and sworn to  
before me this 10<sup>th</sup> day  
of January, 1980

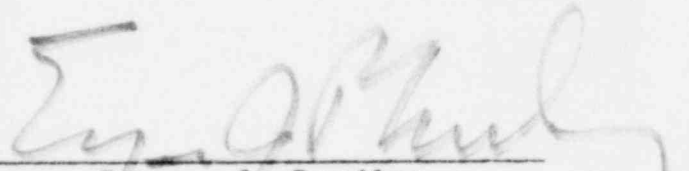
Elizabeth H. Boyer  
Notary Public

ELIZABETH H. BOYER  
Notary Public, Phila., Phila. Co.  
My Commission Expires Jan. 30, 1982

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CERTIFICATE OF SERVICE

I certify that service of the foregoing Application was made upon the Board of Supervisors, Peach Bottom Township, York County, Pennsylvania, by mailing a copy thereof, via first-class mail, to Albert R. Steele, Chairman of the Board of Supervisors, R. D. No. 1, Delta, Pennsylvania 17314; upon the Board of Supervisors, Fulton Township, Lancaster County, Pennsylvania, by mailing a copy thereof, via first-class mail, to George K. Brinton, Chairman of the Board of Supervisors, Peach Bottom, Pennsylvania 17563; and upon the Board of Supervisors, Drumore Township, Lancaster County, Pennsylvania, by mailing a copy thereof, via first-class mail, to Wilmer P. Bolton, Chairman of the Board of Supervisors, R. D. No. 1, Holtwood, Pennsylvania 17532; all this 14th day of January, 1980.

  
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Eugene J. Bradley  
Attorney for  
Philadelphia Electric Company

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