10 CFR 50.90

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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August 20, 1993

STATION SUPPORT DEPARTMENT

Docket Nos. 50-277
50-278
License Nos. DPR-44
DPR-56

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Technical Specifications Change Request 92-09

Dear Sir:

Philadelphia Electric Company (PECo) hereby submits Technical Specifications Change Request (TSCR) No. 92-09, in accordance with 10 CFR 50.90, requesting a change to Appendix A of the Peach Bottom Facility Operating License. This TSCR will allow a modification to the Standby Gas Treatment System (SGTS) Charcoal Filter Deluge System. The modification is being completed to minimize the risk of an inadvertent operation of SGTS charcoal filter deluge system.

Attachment 1 to this letter describes the proposed changes, and provides justification for the changes. Attachment 2 contains the revised Technical Specification pages.

If you have any questions regarding this matter, please contact us.

Very truly yours,

G. A. Hunger, Jr.

G. A. Hunger, Director
Licensing Section

Enclosures: Affidavit, Attachment 1, Attachment 2

cc: T. T. Martin, Administrator, Region I, USNRC
B. S. Norris, USNRC Senior Resident Inspector, PBAPS
W. P. Dornsife, Commonwealth of Pennsylvania

A001

COMMONWEALTH OF PENNSYLVANIA:

: ss.

COUNTY OF CHESTER :

G. R. Rainey, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company; the Applicant herein; that he has read the attached Technical Specifications Change Request (Number 92-09) for Peach Bottom Facility Operating Licenses DPR-44 and DPR-56, 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.

G. R. Rainey

Vice President

Subscribed and sworn to
before me this 6th day
of August 1993.

Notary Public

Notarial Seal
Erica A. Santon, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires

ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

TECHNICAL SPECIFICATION CHANGE REQUEST
92-09

"Standby Gas Treatment System Deluge System Conversion"

Supporting Information for Changes 2 Pages

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

Philadelphia Electric Company (PECo), Licensee under Facility Operating Licenses DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station (PBAPS) Unit No. 2 and Unit No. 3, respectively, requests that the Technical Specifications contained in Appendix A to the Operating Licenses be amended. Proposed changes to the Technical Specifications are indicated by vertical bars in the margin of TS page 240f. The proposed revised page for each unit is included in Attachment 2. PECo is requesting that this amendment be approved prior to the end of the Unit 3 ninth refuel outage. PECo requests that the proposed changes be effective upon completion of the associated plant modification. The TSCR being proposed is required because the automatic activation feature of the Standby Gas Treatment System (SGTS) will be removed; however, the existing automatic valve station will remain operable until the TSCR is approved.

Description of Changes

The Licensee proposes that Surveillance Requirement 4.14.A.7.a for the SGTS be amended to replace the requirement for a simulated automatic actuation test with a requirement to manually exercise the deluge valves. The proposed 4.14.A.7.a would state,

"Manual activation test every 18 months."

Safety Discussion

A modification to convert the SGTS charcoal filter deluge system from automatic to manual initiation is being installed to minimize the risk of inadvertent operation of the SGTS deluge system. To complete this modification, the existing automatically actuated valve station located in the SGTS room will be replaced with a new manually operated valve station located in the adjacent stairwell. The new manual station will consist of a system block valve; which will control flow to the SGTS "A" and "B" train deluge system supply lines and an isolation valve and a control valve installed in series on each supply line. All of the valves will normally be locked closed. The existing heat detectors will continue to provide an alarm in the control room. The existing pressure switches will be relocated or replaced and will continue to provide flow indication to the control room. The modification effectively addresses industry concerns associated with the inadvertent actuation of the deluge system. Such inadvertent actuation has occurred at PBAPS, and renders the charcoal filter train inoperable.

The testing requirement being proposed will be on the same 18 month frequency as the previous automatic actuation tests. The alarm and flow logics are tested by other surveillance requirements; therefore, the only components in the charcoal filter deluge system that must be tested are the block valves. This will maintain the same level of operational assurance, while the decrease in the likelihood of inadvertent actuation will improve the overall availability of the SGTS.

No Significant Hazards Consideration

The changes proposed in this Application do not constitute a significant hazards consideration in that:

i) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because the modification and the TSCR do not affect any transient or accident evaluations. The existing simulated automatic actuation test and the proposed manual test is or will be performed with the associated SGTS line out of service. The system's hydraulic performance is unaffected by the modification. The manually actuated system will result in an increase in response time to a charcoal filter fire. The increase in response time does not affect the consequences of the fire because response time is not a critical factor item due to the slow-developing, non-flaming characteristics of this type of fire. In addition, the redundant SGTS train is unaffected by the charcoal fire because it is separated from the affected train by a 2 foot thick concrete wall.

ii) The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated because no accident precursors are introduced by either the TSCR or the modification.

iii) The proposed changes do not involve a significant reduction in a margin of safety because the system's design performance will not be degraded as a result of either the modification or the TSCR.

Environmental Assessment

An environmental impact assessment is not required for the changes proposed by this Application because the changes conform to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22(c)(9).

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes and have concluded that they do not involve an unreviewed safety question and are not a threat to the health and safety of the public.