PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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10 CFR 50.90

March 5, 1993

NUCLEAR SERVICES 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 Specification Change Request

Dear Sir:

Philadelphia Electric Company (PECo) hereby submits Technical Specification Change Request (TSCR) 92-11, in accordance with 10 CFR 50.90, requesting a change to Appendix A of the Peach Bottom Atomic Power Station (PBAPS) Operating Licenses. The proposed change concerns the PBAPS seismic monitoring instrumentation.

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

If you have any questions concerning this submittal, please contact us.

Sincerely,

G. J. Beck, Manager
Licensing Section

Enclosures: Affidavit, Attachment 1, Attachment 2

cc: T. T. Martin, Administrator, Region I, USNRC
J. J. Lyash, Senior Resident Inspector, PBAPS, USNRC
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 Specification Change Request (TSCR 92-11) for changes to the 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 5th day
of March 1993.

Notary Public

Notarial Seal
Erica A. Santon, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires July 10, 1995

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
92-11

"Seismic Monitoring Instrumentation"

Supporting Information for Changes

Philadelphia Electric Company (PECo), Licensee under Facility Operating Licenses DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 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 margins of the pages contained in Attachment 2 and listed here: 240u and 240w.

The proposed changes concern Table 3.15 and its associated Bases for the Seismic Monitoring Instrumentation portion of the Technical Specifications.

Licensee proposes that the changes will be issued on or before June 1, 1993. These changes will be effective upon completion of the installation of the seismic monitoring instrumentation.

Description of Changes

Licensee proposes the following changes:

(1) Revise existing Measurement Range for theTriaxial Time-History Accelerographs and the Triaxial Response - Spectrum Recorders from 0.1 - 10g to the range of -1 to 1g in Table 3.15 on page 240u.

(2) Revise existing Bases 3.15/4.14 on page 240w to describe the upgraded seismic monitoring instrumentation. The proposed wording is:

"The time-history recordings of the triaxial time-history accelerographs are done in the cable spreading room using a solid-state accelerograph. The data is then processed and the results of the response spectrum analysis can be evaluated following a seismic event."

Safety Discussion

The proposed changes are required to support PBAPS Modification 5280 which was initiated to upgrade the Unit 2 and 3 seismic monitoring instrumentation.

Modification 5280 will replace the existing instrumentation with a more reliable solid state computer based system, thereby enhancing its capability to monitor and alarm seismic activity during and after a seismic event.

Change request 1) is proposed to revise the existing measurement range for the triaxial time-history accelerographs and triaxial response-spectrum recorders in Table 3.15. Both the triaxial time-history accelerogrphs and the triaxial response-spectrum recorders are currently calibrated to the PBAPS design measurement range of -1 to 1g (a vector designation). However,

Table 3.15 of the Technical Specifications identifies them as having a measurement range of 0.1 - 10g (a scalar designation). The 0.1 - 10g value represents the absolute range that the instruments are capable of providing not the specified PBAPS design measurement range of -1 to 1g.

The specified PBAPS design measurement range was adjusted by the vendor to the -1 to 1g range prior to the shipment of the instruments. However, the 0.1 - 10g value was used during the development of the PBAPS Technical Specification pages. This discrepancy has existed since the installation of the original seismic monitoring instrumentation. Technical Specification page 240u, when revised, will accurately reflect the newly installed seismic monitoring instrumentation's design measurement range of -1 to 1g.

Page 240u, Section 2, "Triaxial Peak Accelerographs" is being revised to replace the dash with the word "to" in the measurement range. This change is proposed for clarity and consistency purposes.

Change request 2) is proposed to revise the Bases Section 3.15/4.14 to describe the upgraded seismic monitoring instrumentation. Currently the Bases state that the time-history recordings of the triaxial time-history accelerographs are done on a digital cassette accelerograph. Because the modification replaces the existing cassette accelerographs with solid state equipment, the Bases Section will be revised to reflect the change.

No Significant Hazards Consideration

Licensee proposes that this application does not involve significant hazards consideration for the following reasons:

i) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change revises the Measurement Range of the Triaxial Time-History Accelerographs and the Triaxial Response-Spectrum Recorders. The current Technical Specification values for the Measurement Range represent the total range that the instrument is capable of providing, not the specified design measurement range for PBAPS.

The proposed changes do not affect the initial conditions or precursors assumed in any Updated Final Safety Analysis Report Section 14 accident analysis. Further, these proposed changes do not decrease the effectiveness of equipment relied upon to mitigate the previously evaluated accidents.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

ii) The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed changes enhances the seismic systems ability to accurately monitor and alarm seismic activity. It does not change any operating procedures. Therefore implementation of the proposed changes will not affect the design function or configuration of any component or introduce any new operating scenarios or failure modes or accident initiation.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

iii) The proposed changes do not involve a significant reduction in a margin of safety.

Revising the Technical Specifications to accurately reflect the measurement range of the new seismic monitoring instrumentation does not affect any safety related equipment or activity.

Therefore, the proposed changes do not reduce any margin of safety.

Environmental Impact 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 50.22(c)(9). The proposed changes do not involve any systems or equipment that have a direct relationship with the environment. The changes revise the measurement range of the PBAPS seismic monitoring instruments as discussed in the previous section.

The Application involves no significant change in the types or significant increase in the amounts of any effluent that may be released offsite and there will be no significant increase in individual or cumulative occupational radiation exposure.

Conclusion

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