PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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March 11, 1993

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

NUCLEAR SERVICES DEPARTMENT

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 92-10

Dear Sir:

Philadelphia Electric Company (PECo) hereby submits Technical Specifications Change Request (TSCR) No. 92-10, in accordance with 10 CFR 50.90, requesting a change to Appendix A of the Peach Bottom Facility Operating Licenses. The proposed changes concern clarifying the definition of Shutdown Mode in the definition section of Technical Specifications. A discrepancy between the Updated Final Safety Analysis Report (UFSAR) description of the mode switch shutdown scram bypass, the Technical Specifications and the as built design was discovered. This TSCR is being submitted to clarify the definition in the TS and to eliminate the discrepancy.

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, Manager
Licensing Section

Enclosures: Affidavit, Attachment 1, Attachment 2

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

A001
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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 92-10) 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.

Gerald R Rainey

Vice President

Subscribed and sworn to
before me this 10th day
of MARCH 1993.

Catherine A Mendez

Notary Public

NOTARIAL SEAL
CATHERINE A. MENDEZ Notary Public
Tredyffrin Twp., Chester County
My Commission Expires April 9, 1993

ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

Docket Nos. 50-277
50-278

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TECHNICAL SPECIFICATION CHANGE REQUEST
92-10

"Shutdown Mode - Definition Clarification"

Supporting Information for Changes 2 Pages

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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 page 7. The proposed revised page 7 for each unit are included in Attachment 2.

Description of Changes

(1) The Licensee proposes that the definition of Shutdown Mode be revised. The current definition states: "Placing the mode switch to the shutdown position initiates a reactor scram and power to the control rod drives is removed. After a short time period (about 10 secs), the scram signal is removed allowing a scram reset and restoring the normal valve lineup in the control rod drive hydraulic system; also, the main steam line isolation scram and main condenser low vacuum scram are bypassed.". The proposed definition would state: "Placing the mode switch to the shutdown position initiates a reactor scram. After about 2 seconds, this SCRAM signal is bypassed. The SCRAM logic cannot be reset until a 10 second timer is complete. The SCRAM can then be reset to restore the normal valve line-up in the control rod drive hydraulic system." This is applicable to both units.

Safety Discussion

The proposed changes are administrative in nature and serve to clarify the exact design of the Peach Bottom reactor mode switch shutdown scram bypass. There is no change in the design of either the manual scram bypass logic or the scram reset logic. The two (2) second time delay before the mode switch scram bypass becomes effective ensures that the scram signal is completely latched. The ten (10) second delay ensures that the control rods have time to fully insert and is effective for all SCRAM signals.

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No Significant Hazards Consideration

The change request proposed in this Application does 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 they do not affect operation, equipment, or a safety related activity and are hence administrative in nature. Thus, these administrative changes cannot affect the probability or consequences of any accident.

ii) The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated because these changes are purely administrative and do not affect the plant. Therefore, these changes cannot create the possibility of any accident.

iii) The proposed changes do not involve a significant reduction in a margin of safety because the changes do not affect any safety related activity or equipment. These changes are purely administrative in nature and do not affect the margin of safety.

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.