

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS
955-65 CHESTERBROOK BLVD.
WAYNE, PA 19087-5691

10 CFR 50.90

(215) 640-6000

October 5, 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 92-08

Dear Sir:

Philadelphia Electric Company (PECo) hereby submits Technical Specifications Change Request (TSCR) No. 92-08, in accordance with 10 CFR 50.90, requesting a change to Appendix B of the Peach Bottom Facility Operating Licenses. The proposed Environmental Technical Specification Changes are intended to make the Plant Operating Review Committee (PORC) review, the Nuclear Review Board (NRB) review, Radiological Environmental Monitoring Program requirements, position titles, and the organization chart which are presently in Appendix B consistent with Appendix A.

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
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS
W. P. Dornsife, Commonwealth of Pennsylvania

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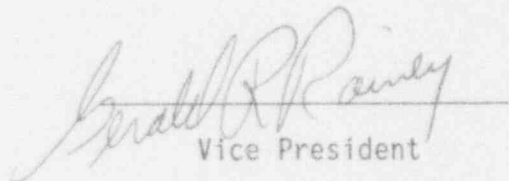
COMMONWEALTH OF PENNSYLVANIA :

: ss.

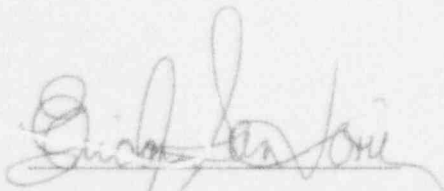
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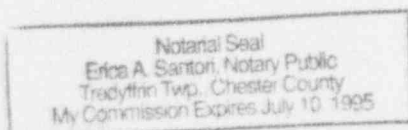
G. R. Rainey, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company; the Applicant herein; that he has read the attached Technical Specifications Change Request (Number 92-08) 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.


Vice President

Subscribed and sworn to
before me this ^{5th} day
of October 1993.


Notary Public



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
92-08

"Environmental Technical Specification Changes"

Supporting Information for Changes - 3 Pages

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 Environmental Technical Specifications (TS) contained in Appendix B to the Operating Licenses be amended. Proposed changes to the Environmental Technical Specifications are indicated by vertical bars in the margin of Appendix B pages ii, 42, 48, 49, 50, and 53. The proposed revised pages for each unit are included in Attachment 2.

Description of Changes

- (1) The Licensee proposes to delete Table 6.4-1, titled Environmental Radiation Monitoring Program.
- (2) The Licensee proposes that the organization and the reporting requirements delineated in Section 7.1.1 Organization be revised to change the Plant Superintendent to the Plant Manager. The proposed change would also require that the Plant Manager report to the Vice President, PBAPS. The proposed section would state:
 - A. The Plant Manager is responsible for the operation of the facility and to assure that the facility operates within the limits set forth in the environmental technical specifications.
 - B. In all matters pertaining to operation of the facility and to the environmental technical specifications, the Plant Manager shall report to, and consult with the Vice President - PBAPS.
- (3) The Licensee proposes that the titles delineated in sections 7.2.2, 7.2.3, and 7.2.4 be revised. The Superintendent, Nuclear Generation Division and the Superintendent Nuclear Services will be replaced with the titles of the positions which now perform those functions: the Plant Manager and the Vice President - PBAPS.
- (4) The Licensee proposes that TS Section 7.1.2.A be deleted.
- (5) The Licensee proposes that TS Section 7.1.2.B be deleted.
- (6) The Licensee proposes that TS Section 7.3 be deleted.
- (7) The Licensee proposes to delete the Organization Chart, Figure 7.1.1, titled Management Organization Chart.

Safety Discussion

The proposed change (1) is administrative in nature. A Radiological Environmental Monitoring Program is already required as specified in section 4.8.E of Appendix A TS and control of changes to the program will continue to be covered under section 6.5 of Appendix A TS.

The proposed changes (2) and (3) are administrative in nature and serve to clarify the current titles at PBAPS.

The proposed change (4) is administrative in nature. PORC will still review new procedures, tests, experiments, procedure changes and temporary procedure changes that require a safety evaluation. The review and approval process is controlled by administrative procedures, which will continue to be reviewed by PORC and approved by the Plant Manager. Qualified personnel knowledgeable in the affected functional area will review each procedure and procedure change. Station Qualified Reviewers (SQR) are required to consider and document whether cross disciplinary review is necessary. These reviews, if necessary, will be performed prior to approval. PORC will still review and approve proposed changes to the remaining Environmental Technical Specifications. Environmental deviations are reviewed for reportability and evaluated for causes and correction actions in accordance with the Performance Enhancement Program as delineated in administrative procedures.

The proposed change (5) is administrative in nature. NRB will still review and approve proposed changes to the remaining Environmental TS. This is delineated in administrative procedures. NRB will still review, as described in section 6.5 of Appendix A TS, proposed changes or modifications to plant systems or equipment which may have an environmental impact on the plant. NRB will still conduct periodic audits, as described in section 6.5 of Appendix A TS. NRB will still review all reported environmental deviations as delineated in administrative procedures.

The proposed change (6) is administrative in nature. Unit Operating Procedures and Check-off lists are already required as specified in section 6.8, and control of their changes will be covered under section 6.5 of Appendix A Technical Specifications.

The proposed change (7) is also administrative in nature. The management organization chart is being removed to be consistent with the changes approved in Amendments 155/157 for Appendix A, which were proposed in response to Generic Letter 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements."

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 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.

- 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.

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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).

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