

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

935-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

November 19, 1993

Docket Nos. 50-277

50-278

License Nos. DPR-44

DPR-56

STATION SUPPORT 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 93-14

Dear Sir:

Philadelphia Electric Company hereby submits Technical Specifications (TS) Change Request No. 93-14, in accordance with 10CFR50.90, requesting a change to Appendix A of the Peach Bottom Facility Operating Licenses. Attachment 1 to this letter describes the proposed change and provides justification for the change. Attachment 2 provides the revised TS pages.

This submittal requests a change to the Unit 2 and Unit 3 TS to eliminate the listing of specific position titles for the Plant Operations Review Committee (PORC) composition in favor of allowing the Plant Manager to appoint PORC members which would eliminate the need to change TS in the future whenever a position title is changed.

The proposed change is consistent with the intent of NRC Generic Letter (GL) 88-06 dated March 22, 1988, "Removal of Organizational Charts from Technical Specification Administrative Control Requirements." The proposed change is also similar to those approved by Amendment Numbers 20 and 10, dated November 14, 1990, issued by the NRC staff to Houston Lighting and Power Company's South Texas Project, Units 1 and 2, Amendment Number 122, dated October 10, 1989, issued to Florida Power Corporation's Crystal River, Unit 3, and Amendment Number 169 dated January 31, 1992, issued to Toledo Edison Company's Davis-Besse Nuclear Power Station, Unit 1.

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

Very truly yours,

G. A. Hunger, Jr.
 G. A. Hunger, Jr., Director
 Licensing Section

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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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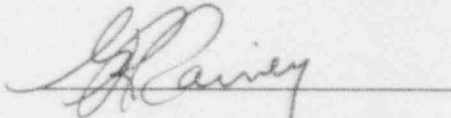
COMMONWEALTH OF PENNSYLVANIA:

: ss.


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 93-14) for Peach Bottom Atomic Power Station 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 19th day
of November 1993.


Notary Public

Notarial Seal
Erica A. Santori, 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 SPECIFICATIONS CHANGE REQUEST
93-14

"PORC Composition"

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 Technical Specifications (TS) be amended as proposed below to eliminate the specific position titles for the Plant Operations Review Committee (PORC) composition in favor of allowing the Plant Manager to appoint PORC members. The proposed change would eliminate the need to change TS in the future whenever a position title is changed.

This TS Change Request for PBAPS, Units 2 and 3, provides a discussion and description of the proposed change, a safety assessment, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

The proposed revised TS pages for Units 2 and 3 are provided in Attachment 2. The proposed change is indicated by a vertical bar in the margin of page 246. Please note that Attachment 2 reflects only the changes proposed by this request. Other changes to page 246 were submitted by letter dated October 27, 1993 and are pending NRC approval.

We request that, if approved, the TS changes be effective upon issuance.

Discussion and Description of the Proposed Changes

This request changes the composition of the PORC by deleting specific titles and replacing them with a generic statement which allows the Plant Manager to change the composition of the PORC without processing a TS change every time a position title changes. Members of the PORC will meet the qualifications described in Sections 4.2, 4.4, or 4.6 of ANSI N18.1-1971, "Standard for Selection and Training of Nuclear Power Plant Personnel."

The proposed change to the PBAPS TS would be for Section 6.5.1.2 to read as follows:

"The Plant Operations Review Committee is composed of nine regular members from Peach Bottom Atomic Power Station staff. Members shall collectively have experience in the following areas:

- Plant Operations
- Engineering
- Maintenance
- Instrumentation and Controls
- Planning
- Radiation Safety
- Chemistry
- Experience Assessment

Members shall meet the requirements of ANSI N18.1-1971, Sections 4.2, 4.4, or 4.6 for applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairmen of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager."

Safety Assessment

The proposed change is administrative in nature. The function and responsibilities of PORC remained unchanged. The composition of PORC will continue to be made of members whose qualifications meet or exceed those required for the Facility Staff.

Information Supporting a Finding of No Significant Hazards Consideration

The change proposed in this Application does not constitute a Significant Hazards Consideration in that:

- i) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed TS change is administrative in nature. The PORC member titles will be removed from the TS to facilitate not requiring that a TS change be submitted for NRC approval when position titles change. PORC member qualifications will continue to be consistent with those required for the Facility Staff and meet or exceed Sections 4.2, 4.4, or 4.6 of ANSI N18.1-1971. The proposed change ensures that PORC will continue to be comprised of personnel involved in daily plant activities who are experienced individuals with varied expertise. By maintaining the qualification requirements for members of PORC who represent various areas of expertise, PORC will continue to fulfill its requirements specified in TS Section 6.5.1.6. The proposed change does not involve any physical changes to plant systems, structures, or components (SSC), or the manner in which these SSC are operated, maintained, modified, tested, or inspected. Therefore, the proposed TS change does not involve a significant increase in the probability or consequences of an accident previously evaluated.
- ii) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because implementation of the proposed TS change will not involve physical changes to plant SSC or the manner in which these SSC are operated, maintained, modified, tested or inspected. The proposed change does not introduce any new modes of plant operation or make any changes to system setpoints which would initiate a new or different kind of accident. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated is not created.

- iii) The proposed change does not involve a significant reduction in a margin of safety because the proposed TS change is administrative in nature by providing internal flexibility in changing organizational titles and does not reduce the PORC function or responsibilities. PORC will continue to be filled by appropriately qualified personnel who have a variety of expertise. The change does not affect the plant material condition, operation, or accident analyses. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Information Supporting an Environmental Assessment

An environmental impact assessment is not required for the change proposed by this Application because the change conforms to the criteria for "actions eligible for categorical exclusion," as specified in 10CFR51.22(c)(9). The requested change will have no impact on the environment. The proposed change does not involve a Significant Hazards Consideration as discussed in the preceding section. The proposed change does not involve a significant change in the type or significant increase in the amounts of any effluent that may be released offsite. The proposed change would not authorize any change in the authorized power level of the facility. In addition, the proposed change does not involve a significant increase in individual or cumulative occupation radiation exposure.

Conclusion

The PORC and the Nuclear Review Board have reviewed the proposed change to the TS and have concluded that the change does not involve an unreviewed safety question and will not endanger the public health and safety.