

PHILADELPHIA ELECTRIC COMPANY

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

10 CFR 50.90

(215) 640-6000

December 21, 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 Specification Change Request

Dear Sir:

Philadelphia Electric Company (PECo) hereby submits Technical Specification Change Request (TSCR) 93-27, 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 administrative changes revise Table 3.2.F, "Surveillance Instrumentation," to accurately describe the main stack high range and reactor building roof vent high range radiation monitors, and deletes previously approved TSCR 91-10 for Unit 3 (Amendment No. 168). TSCR 91-10 requested an emergency temporary change to the Technical Specifications to allow fuel loading to take place without all control rods fully inserted into the core.

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

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U. S. Nuclear Regulatory Commission
PBAPS Units 2 and 3
TSCR 93-27

December 21, 1993
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Enclosures: Affidavit, Attachments
cc: T. T. Martin, Administrator, Region I, USNRC
W. L. Schmidt, Senior Resident Inspector, PBAPS, USNRC
W. P. Dornsife, Commonwealth of Pennsylvania

COMMONWEALTH OF PENNSYLVANIA:

: SS.

COUNTY OF CHESTER

:

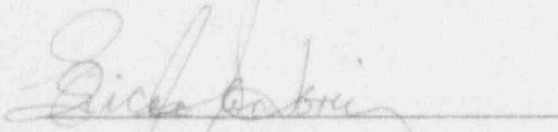
D. M. Smith, being first duly sworn, deposes and says:

That he is Senior Vice President of Philadelphia Electric Company; the applicant herein; that he has read the attached Technical Specification Change Request (TSCR 93-27) 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.

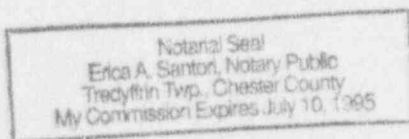


Senior Vice President

Subscribed and sworn to
before me this 21st day
of December 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
93-27

"Main Stack High Range and Reactor Building
Roof Vent High Range Radiation Monitors"

and

Deletion of Emergency TSCR 91-10 (Unit 3)

"Temporarily Allow Fuel Loading
Without All Control Rods Inserted"
(Amendment 168)

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 Unit 2 page 77a and Unit 3 pages 77a and 225. The proposed revised pages are contained in Attachment 2.

The proposed changes concern the main stack high range and reactor building roof vent high range radiation monitors and deletion of previously approved TSCR 91-10 (Amendment 168) for Unit 3.

Licensee proposes that the changes be effective as of the issuance date of the license amendments.

Description of Changes

Licensee proposes the following changes:

"Main Stack High Range and Reactor Building Roof Vent High Range Radiation Monitors"

Page 77a (Table 3.2.F), "Surveillance Instrumentation"

- (1) Revise Item 16, "Instrument" column to read:

RR-0-17-051

- (2) Revise Item 16, "Type Indication and Range" column to read:

Recorder
 10^5 to 10^{11} CPS
(Log Scale)

- (3) Revise Item 17, "Instrument" column to read:

RR-2979 (Unit 2)
RR-3979 (Unit 3)

- (4) Revise Item 17, "Type Indication and Range" column to read:

Recorder
10⁷ to 10¹³ CPM
(Log Scale)

"Deletion of Emergency TSCR 91-10 (Unit 3)"

Page 225, Section 3.10, "Core Alterations"

- (1) Revise Limiting Condition for Operation (LCO) 3.10.A.1, by deleting reference to LCO 3.10.A.2, to read:

"The reactor mode switch shall be locked in the "Refuel" position during core alterations and the refueling interlocks shall be operable except as specified in 3.10.A.5 and 3.10.A.6 below."

- (2) Delete existing LCO 3.10.A.2 and LCO 3.10.A.2.a, along with corresponding footnote in "Surveillance Requirements" column.

- (3) Insert proposed LCO 3.10.A.2 to read:

"Fuel shall not be loaded into the reactor core unless all control rods are fully inserted."

Safety Discussion

The proposed administrative changes are intended to clarify the Technical Specifications by revising Table 3.2.F, "Surveillance Instrumentation," to accurately describe the main stack and reactor building roof vent high range radiation monitors and by deleting previously approved emergency TSCR 91-10 (Amendment No. 168), which was in effect during the period prior to completion of tensioning the reactor vessel head bolts for the Unit 3 Cycle 8 refueling outage.

The main stack and reactor building roof vent high-range radiation recorder was installed in 1982. Three-pen recorder RR-7127 was installed in panel 00C512; however, in March 1987

modification 1549C removed panel 00C512, including RR-7127, to allow the installation of the new hydrogen chemistry panels 20C810, 30C810 and a new panel 00C512.

The three radiation monitoring input signals to the previously used radiation recorder RR-7127 were moved to three separate radiation recorders in three separate panels. The main stack high-range radiation signal which was recorded on recorder RR-7127 (green pen) is now recorded on RR-0-17-051 located in panel 00C14. Reactor building roof vent high-range radiation signal which was recorded on RR-7127 (red pen U/2) and RR-7127 (blue pen U/3) are now recorded on RR-2979 (Unit 2) installed in panel 20C10 and RR-3979 (Unit 3) installed in panel 30C10. At the time of Modification 1549C, the TS Table 3.2.F was not affected as it did not indicate tag numbers or pen colors.

Between the time modification 1549C was issued and installed, TSCR 86-10 was approved by the NRC by amendment No. 128/131. TSCR 86-10, which included recorder RR-7127, added tag numbers and pen colors to the recorders in Table 3.2.F. TSCR 86-10 also added columns for "Item" and "Instrument" to Table 3.2.F for clarity. Therefore, when modification 1549C was installed, a discrepancy existed between the TS and the as-built condition of the plant.

The PBAPS Plant Operations Review Committee (PORC) has developed PORC Position #51 to interpret the Technical Specifications until TSCR 93-27 is approved.

The changes associated with the deletion of TSCR 91-10 (Amendment No. 168) are being proposed because they are no longer necessary. TSCR 91-10 was originally necessary to minimize delay of fuel inspections while evaluating inspection results and preparing for cleaning activities during the PBAPS Unit 3 Cycle 8 refueling outage. TSCR 91-10 originally revised TS pages 225, 226 and 229. By letter dated May 25, 1993, PECO submitted TSCR 92-06 which proposed the deletion of TSCR 91-10 (Amendment 168) for pages 226 and 229; however, page 225 was inadvertently omitted. As a result of conversations with the NRC Project Manager for PBAPS, we are including the proposed changes to page 225 with this TSCR.

The above proposed administrative changes will enhance safety by eliminating confusion when interpreting the Technical Specifications.

No Significant Hazards Consideration

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

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

Because the proposed changes are administrative in nature, they do not affect the initial conditions or precursors assumed in the Updated Final Safety Analysis Report Section 14. These changes do not decrease the effectiveness of equipment relied upon to mitigate the previously evaluated accidents.

Therefore, there is no 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 previously evaluated.

The proposed changes do not make any physical changes to the plant or changes to 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 change does not involve a significant reduction in a margin of safety.

The proposed changes are administrative in nature and are intended to provide clarification or eliminate confusion when interpreting the Technical Specifications. The proposed changes do not adversely affect the assumptions or sequence of events used in any accident analysis.

Therefore, the proposed changes do not involve a reduction in 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 51.22(c)(9). The proposed changes do not involve any systems or equipment that have a direct relationship with the environment. The changes involve correcting a discrepancy that exists between the TS and the as-built condition of the plant and, the deletion of previously approved TSCR 91-10 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 the proposed changes and have concluded that they do not involve an unreviewed safety question and that they are not a threat to the health and safety of the public.