

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of :
Docket Nos. 50-277
PHILADELPHIA ELECTRIC COMPANY :
50-278

APPLICATION FOR AMENDMENT
OF
FACILITY OPERATING LICENSES
DPR-44 & DPR-56

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Philadelphia Electric Company, Licensee under Facility Operating License DPR-44 and DPR-56 for Peach Bottom Atomic Power Station Unit Nos. 2 and 3, respectively, hereby requests that the Technical Specifications incorporated in Appendix A of the Operating License be amended by revising certain sections as indicated by a vertical bar in the margin of the attached pages 4, 67, 240m, 240n, and 262. A discussion of each of the requested changes is set forth below.

- 1) The proposed revision to page 4 of the Technical Specifications changes the definition of Primary Containment Integrity, to remove an inconsistency with the Limiting Condition for Operation contained in Section 3.7.D.2 and to more closely follow the Standard Technical Specification (NUREG-0123, Rev. 3).
- 2) Table 3.2.B, page 67 of Appendix A, "Instrumentation that Initiates or Controls the Core and Containment Cooling System", contains an obsolete entry and references which deal with modifications to the LPCI (Low Pressure Coolant Injection) Pump start timers. Since these modifications have been completed, it is requested that the obsolete material be deleted. Additionally, revisions to the "REMARKS" column are proposed to clearly indicate that the interlocks apply to both the RHR and Core Spray system. These revisions serve to remove potential confusion.
- 3) The proposed revisions to pages 240m and 240n delete the references to smoke detectors S22A and S180 from Table 3.14.C.1 of Appendix A. The proposed revision corrects an error in Licensee's Application for Amendment to Facility Operating Licenses DPR-44 and DPR-56 dated February 18, 1982.

Misinterpretation of the electrical drawings in the early stages of the fire protection modifications referenced in the Amendment Application led to the false conclusion that there was redundant safe shutdown equipment located in Neutron Monitoring Room No. 210 at elevation 135 ft. of Unit No. 2 and Neutron Monitoring Room No. 255 at elevation 135 ft. of Unit No. 3.

Regulation 10CFR50, Appendix R, requires the installation of automatic fire detection systems in areas of the plant containing safe shutdown components.

Subsequently, a field survey and reevaluation conducted in the midst of the modifications prior to the submittal of the Amendment Application revealed that the safe shutdown equipment is physically located in the general area above these rooms. This general area is presently protected by a smoke detection system in accordance with the requirements of 10CFR50, Appendix R. For these reasons, smoke detectors S22A and S180 were deleted from the final design of the smoke detection systems and removed from service prior to the completion of the fire protection modifications. However, the final design was not reflected in the Application for Amendment referenced above.

- 4) The proposed revision to page 262 of the Technical Specifications revises the requirement for administrative control of high radiation area keys as specified in Section 6.13.1.b to extend control of the keys to the Health Physics group as shown on revised page 262 of the proposed Technical Specifications. The proposed revision conforms to the Standard Technical Specifications (NUREG-0123, Rev. 3, Section 6.12.2, Page 6-20) and would provide more effective control of high radiation area keys since the Health Physics group has a better overall knowledge of the radiation levels in all areas of the plant. Additionally, extending control of the keys to the Health Physics group reduces the administrative details of the shift supervision while also reducing the amount of unnecessary personnel in the control room.

Pursuant to 10CFR Section 170.22, "Schedule of Fees for Facility License Amendments", Licensee proposes that this Application for Amendment be considered a Class III Amendment for Unit 2 and a Class I Amendment for Unit 3, since the proposed changes are deemed not to involve a significant hazards consideration.

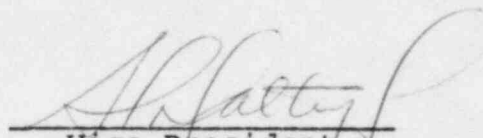
The Plant Operation Review Committee and the Operation and Safety Review Committee have reviewed these proposed changes

to the Technical Specifications, and have concluded that they do not involve an unreviewed safety question or a significant hazard consideration; and will not endanger the health and safety of the public.

Respectfully submitted,

PHILADELPHIA ELECTRIC COMPANY

By:


Vice President

COMMONWEALTH OF PENNSYLVANIA

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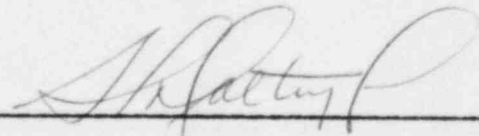
SS.

COUNTY OF PHILADELPHIA

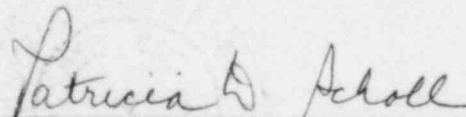
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S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating Licenses 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.



Subscribed and sworn to
before me this 11th day
of March 1983


Notary Public

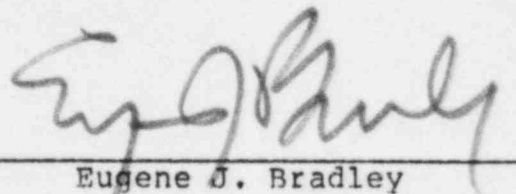
PATRICIA D. SCHOLL

Notary Public, Philadelphia, Philadelphia Co.

My Commission Expires February 10, 1986

CERTIFICATE OF SERVICE

I certify that service of the foregoing Application was made upon the Board of Supervisors, Peach Bottom Township, York County, Pennsylvania, by mailing a copy thereof, via first-class mail, to Albert R. Steele, Chairman of the Board of Supervisors, R.D. No. 1, Delta, Pennsylvania 17314; upon the Board of Supervisors, Fulton Township, Lancaster County, Pennsylvania, by mailing a copy thereof, via first-class mail, to George K. Brinton, Chairman of the Board of Supervisors, Peach Bottom, Pennsylvania 17563; and upon the Board of Supervisors, Drumore Township, Lancaster County, Pennsylvania, by mailing a copy thereof, via first-class mail, to Wilmer P. Bolton, Chairman of the Board of Supervisors, R.D. No. 1, Holtwood, Pennsylvania 17532; all this 11th day of March, 1983.



Eugene J. Bradley

Attorney for
Philadelphia Electric Company