



PECO ENERGY

PECO Energy Company
Nuclear Group Headquarters
985 Chesterbrook Boulevard
Wayne, PA 19087-5691

August 19, 1994

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
Response to Request for Additional Information Regarding
Technical Specifications Change Request 94-01

Dear Sir:

By letter dated May 10, 1994, PECO Energy submitted Technical Specifications Change Request (TSCR) 94-01 regarding minimum low pressure cooling requirements when irradiated fuel is in the reactor vessel and the reactor is in the Cold Condition.

The purpose of this letter is to respond to your request for additional information regarding the basis for three values proposed in TSCR 94-01. Responses are provided in the Enclosure to this letter.

Additionally, we would like to clarify a discussion made on page 4 of Attachment 1 of our May 10, 1994 submittal. This discussion indicated that the proposed changes will not allow continued plant activities with plant conditions during a unit outage such that a single failure will result in a loss of any safety function. The existing TS require both Core Spray (CS) subsystems and both Low Pressure Coolant Injection (LPCI) subsystems to be operable. The changes proposed in TS 3.5.F.1 of the May 10, 1994 submittal require either 1) one CS subsystem and one LPCI subsystem or 2) both CS subsystems to be operable. The proposed TS 3.5.F.1 maintains redundancy in the protection provided for low pressure coolant injection and makeup, but not necessarily protection against a single failure. This proposed level of protection is consistent with that defined in NUREG 1433, "Standard Technical Specifications General Electric Plant, BWR/4," and with the basis of other existing PBAPS TS.

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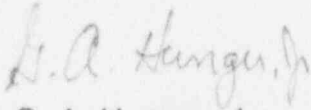
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The Plant Operations Review Committee has re-reviewed the proposed TSCR, including the above clarification, and has confirmed that the TSCR does not involve an unreviewed safety question. We have concluded also that the clarification does not affect the conclusions previously submitted regarding a safety assessment, information supporting a finding of No Significant Hazards Consideration or information supporting an Environmental Assessment. No revisions to the proposed TS pages contained in our May 10, 1994 submittal are required.

If you have any questions, please do not hesitate to contact us.

Sincerely,



G. A. Hunger, Jr.
Director - Licensing

Affidavit, Enclosure

cc: T. T. Martin, Administrator, Region I, USNRC
W. L. Schmidt, Senior Resident Inspector, PBAPS
R. R. Janati, Commonwealth of Pennsylvania

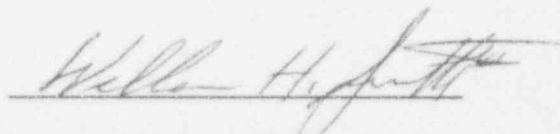
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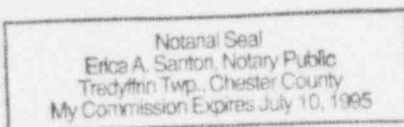
W. H. Smith, III, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company; the Applicant herein; that he has read the enclosed response to the NRC request for additional information concerning Technical Specification Change Request (Number 94-01) 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 19th day
of August 1994.


Notary Public



**PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
REGARDING TSCR 94-01**

Question 1:

In proposed TS item 4.5.F.1, what is the basis for the 11 ft. value?

Response

The minimum water level of 11 ft. for the suppression pool ensures that there is adequate water volume for net positive suction head (NPSH) for the Core Spray (CS) system and Low Pressure Coolant Injection (LPCI) pumps, recirculation volume and vortex prevention.

Question 2:

In proposed TS item 4.5.F.2(b), what is the basis for the 17.3 ft. value?

Response:

The Condensate Storage Tank (CST) Water level of 17.3 ft. is equivalent to approximately 90,976 gallons of water. This volume ensures that the CS system can supply at least 50,000 gallons of makeup water to the reactor pressure vessel. The remaining 40,976 gallons (90,976 - 50,000) corresponds to the level in the CST necessary to prevent vortexing and, therefore, is unavailable for CS suction. As noted in the asterisked note for proposed TS 4.5.F.2(b), only one required CS may take credit for the CST option during operations with a potential for draining the reactor vessel. During these operations, the volume in the CST may not provide adequate makeup if the RPV were completely drained. Therefore, only one CS subsystem is allowed to use the CST. This limitation ensures that the other required Emergency Core Cooling System has adequate makeup volume.

Question 3:

In proposed TS Item 3.5.F.1, what is the basis for the 458 in. value?

Response:

The water level of 458 in. above reactor pressure vessel instrument zero corresponds to 20 ft., 11 in. above the RPV flange. This water level is equivalent to the existing TS 3.5.F.4.b water level of at least 21 feet over the top of irradiated fuel assemblies seated in the spent fuel storage racks with the spent fuel storage gates removed. Representing the level with respect to RPV instrument zero is consistent with Control Room instrumentation, and will enhance operator use. This level provides sufficient coolant inventory to allow operator action to terminate the inventory loss prior to fuel uncover in case of an inadvertent draindown.