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NUCLEAR ENGINEERING &amp; SERVICES DEPARTMENT

April 9, 1991

Docket Nos. 50-277  
50-278License Nos. DPR-44  
DPR-56

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

SUBJECT: Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3  
Technical Specification Change Request No. 89-17  
Response to Request for Additional Information

REFERENCE: Letter dated January 24, 1991 from  
G. Y. Suh (NRC) to G. J. Beck (PECo)

Dear Sir:

On January 30, 1990 Philadelphia Electric Company (PECo) submitted the subject Technical Specifications Change Request (TSCR) primarily to eliminate testing requirements for redundant trains of core and containment cooling systems when one train becomes inoperable, commonly referred to as "accelerated testing" requirements. The referenced NRC letter requested additional information relative to this TSCR. Each individual question is restated below followed by the corresponding PECO response.

1. In its application, the licensee states that when one train becomes inoperable (1) the redundant train will be verified to be operable by administratively checking equipment status relative to operability requirements and (2) the nature of and cause for each condition for inoperability should be individually evaluated to identify generic implications, if any, and to determine whether testing of other systems is warranted. For these two items, please describe what specific actions will be performed and how the proposed actions will be implemented.

Response

The following is what PECO means by "administratively checking equipment status relative to operability requirements" in this context:

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- Reviewing existing Limiting Conditions for Operation (LCO) for conditions related to the core and containment cooling systems of concern (such as, the effects of blocks for repairs or preventive maintenance).
- Walking down the appropriate Control Room panels to confirm that valves in the core and containment cooling systems of concern are in the correct positions.
- Confirming that the Surveillance Requirements of Technical Specifications Section 4.5 for the core and containment cooling systems of concern are satisfied.

These actions will be proceduralized.

The following is what PECO means by "the nature of and cause for each condition of inoperability should be individually evaluated to identify generic implications, if any, and then to determine whether testing of other systems is warranted."

- In the short term following the discovery of the inoperability, engineering judgment is used to bring potentially generic issues to the attention of management and appropriate evaluations are performed to identify if any further action is required.
- Additionally, the investigation of plant events is controlled under a Nuclear Group Administrative Procedure and the process aids in identifying generic implications. Included within the scope of the procedure is system or component inoperabilities. The procedure includes controls for immediate critiques of events, prioritization and timing of event investigations, consideration of generic implications, performance of appropriate remedial as well as longer term corrective action, and reviews of related operating experience including NPRDS.
- A Component Failure Analysis Report is prepared quarterly through the NPRDS program which compares potential equipment performance problems at PBAPS to industry averages. The purpose of this report is to identify corrective actions to reduce further failure of components and related equipment. The report is available for use in evaluating generic implications for failed equipment.

2. Related to Item 1, the proposed TS Bases on page 141 states that verification of operability of redundant trains means to administratively ensure that the remaining trains are not known to be inoperable and provides the example of confirming that equipment is not blocked out of service for maintenance. Please discuss whether the extent and scope of the actions indicated in the proposed TS Bases are consistent with that discussed in response to Item 1, and revise the proposed TS Bases, as appropriate.

Response

PECo proposes to add more examples of what is meant by "administratively checking equipment status relative to operability requirements" of redundant core and containment cooling systems on page 141. This will ensure that every time these LCOs are entered the actions taken will be consistent with PECO's original intentions. A new page 141 of the PBAPS Unit 2 Technical Specifications and a new page 141 of the PBAPS Unit 3 Technical Specifications are attached, and PECO hereby incorporates these pages into TSCR 89-17. Since these changes only affect the Technical Specifications Bases and are administrative in nature, the changes do not impact the conclusions of the Significant Hazards Consideration Determinations of TSCR 89-17.

3. On proposed TS Bases page 135, the information provided in the last paragraph, as currently worded, appears to be unclear and could be interpreted to indicate that (1) a 30 day allowable outage time exists when one low pressure coolant injection (LPCI) pump is inoperable and (2) a 7 day allowable outage time exists when three of four LPCI pumps are inoperable. These interpretations would be inconsistent with the TS limiting conditions for operation. Please revise the proposed TS Bases as appropriate.

Response

PECo agrees that the discussion about LPCI System LCOs on page 135 is confusing and should be revised. Accordingly, a new page 135 of the PBAPS Unit 2 Technical Specifications and a new page 135 of the PBAPS Unit 3 Technical Specifications are attached, which provide this clarification. PECO hereby incorporates these pages into TSCR 89-17. Since these changes only affect the Technical Specifications Bases and are administrative in nature, the changes do not impact the conclusions of the Significant Hazards Consideration Determinations of TSCR 89-17.

4. Please indicate the proposed effective date for the requested license amendments, taking into consideration procedural and administrative changes (e.g., actions related to Item 1) which may be needed to implement the associated TS changes.

Response

PECo requests that the license amendments be effective upon issuance.

April 9, 1991  
Page 4

If you have any questions or require additional information,  
please do not hesitate to contact us.

Very truly yours,



G. J. Beck, Manager  
Licensing Section  
Nuclear Engineering & Services

Attachments: T.S. Pages 135 and 141  
Enclosure: Affidavit

cc: T. T. Martin, Administrator, Region I, USNRC  
J. J. Lyash, USNRC Senior Resident Inspector, PB  
T. M. Gerusky, Commonwealth of Pennsylvania

COMMONWEALTH OF PENNSYLVANIA:

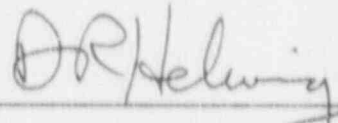
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COUNTY OF CHESTER

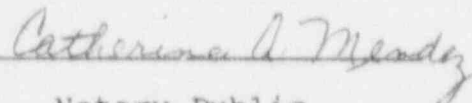
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D. R. Helwig, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company;  
that he has read the foregoing supplement to TSCR No. 89-17 for  
Peach Bottom Atomic Power Station, 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 9<sup>th</sup> day  
of ~~March~~<sup>April</sup> 1991.

  
Notary Public

