

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 REQUESTS
94-11, 94-12 AND 94-13

"Relocation of Audit Topics and Frequencies, NRB Review
Requirements, and Independent Safety Engineering Group
Function to Licensee Controlled Documents"

Supporting Information for Changes: 2 Pages

PECO Energy Company requests that the Technical Specifications (TS) and Environmental TS for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3 be amended as proposed below to relocate audit topics and frequencies, Nuclear Review Board (NRB) review requirements, and requirements associated with the Independent Safety Engineering Group (ISEG) function to licensee controlled documents. These changes are consistent with the corresponding requirements in NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4."

Provided below is a discussion and description of the proposed changes, a safety assessment, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

The proposed revised pages are provided in Attachment 2. Proposed changes are indicated by vertical bars in the margin of the pages.

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

Discussion and Description of the Proposed Changes

1. Relocate audit topics and frequencies in TS Section 6.5.2.8 to the PBAPS Updated Final Safety Analysis Report (UFSAR) and eliminate the reference in Environmental TS Section 7.1.
2. Relocate Nuclear Review Board review requirements in TS Section 6.5.2.7 to the PBAPS UFSAR.
3. Relocate the ISEG requirements in TS Section 6.2.3 to the PBAPS Quality Assurance Program.

Safety Assessment

The proposed changes provide consistency with NUREG-1433, as modified by approved generic change BWOOG-09, by relocating requirements from the TS to licensee controlled documents. The licensee controlled document containing the relocated requirements will be maintained using the provisions of 10CFR50.54(a) or 10CFR50.59.

Information Supporting a Finding of No Significant Hazards Consideration

The changes proposed in the Application do not constitute a Significant Hazards Consideration in that:

- i) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because the changes relocate requirements from the TS to licensee controlled documents consistent with the NRC Final Policy Statement on TS Improvements. Any changes to the licensee controlled documents will be evaluated in accordance with 10CFR50.54(a) or 10CFR50.59 as appropriate. Therefore, these changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.
- ii) The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because the changes will not alter the plant or the manner in which the plant is operated. The changes will not involve a design change or introduce any new failure modes. The changes will not alter assumptions made in the safety analysis and licensing basis. Adequate control of information will be maintained. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

- iii) The proposed changes do not involve a significant reduction in a margin of safety because they have no impact on any safety analysis assumptions. The requirements to be transposed from the TS to licensee controlled documents are the same as the existing TS. Any future changes to licensee controlled documents will be evaluated in accordance with 10CFR50.54(a) or 10CFR50.59 as appropriate. Because the proposed changes are consistent with NUREG-1433, as modified by approved generic change BWO-09, and the change controls for proposed relocated details and requirements provide an equivalent level of regulatory authority, revising the TS to reflect the approved level of detail and requirements ensures no significant reduction in a margin of safety.

Information Supporting an Environmental Assessment

An environmental 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 10CFR51.22(c)(9). The proposed changes will have no impact on the environment. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the proposed changes do not involve a 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 the changes do not involve an unreviewed safety question and will not endanger the public health and safety.

ATTACHMENT 2

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List of Attached Pages

Unit 2

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Unit 3

Appendix A Pages

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PBAPS

Alternates

- 6.5.2.3 A current list of alternates shall be maintained in NRB records. Each alternate member will serve on a continuing basis. Alternates shall vote only in the absence of that member for whom they are the designated alternate.

Consultants

- 6.5.2.4 Consultants shall be utilized as determined by the NRB Chairman to provide expert advice to the NRB.

Meeting Frequency

- 6.5.2.5 The NRB shall meet at least once per calendar quarter.

Quorum

- 6.5.2.6 A quorum of the NRB shall consist of the Chairman or Vice Chairman or their designated alternates and four members or their alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.
- 6.5.2.7 DELETED.

PBAPS

6.5.2.8 DELETED

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PBAPS

Authority

- 6.5.2.9 The NRB shall report to and advise the Executive Vice President - Nuclear.

Records

- 6.5.2.10 Records of NRB activities shall be prepared, approved and distributed as indicated below:
- a. Minutes of each NRB meeting shall be prepared, approved and forwarded to the Executive Vice President - Nuclear within 10 working days following each meeting.
 - b. Reports of reviews encompassed by Section 6.5.2.7.e, f, g, and h, above shall be prepared, approved and forwarded to the Executive Vice President - Nuclear, within 10 working days following completion of the review.

PBAPS

7.0 Administrative Controls

7.1 Organization, Review and Audit

7.1.1 Organization

A. The Plant Manager is responsible for the operation of the facility and to assure that the facility operates within the limits set forth in the environmental technical specifications.

B. In all matters pertaining to operation of the facility and to the environmental technical specifications, the Plant Manager shall report to, and consult with the Vice President-PBAPS.

7.1.2 Review and Audit

Committees for review and audit of plant operation are described in the Quality Assurance Program.

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