PECO ENERGY

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
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October 21, 1994

Docket No. 50-277

License No. DPR-44

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

SUBJECT: Peach Bottom Atomic Power Station, Unit 2
Request for Enforcement Discretion from Technical Specification Section 4.5.C.1.e and 4.5.D.1.e, "HPCI Subsystem" and "RCIC Subsystem"

Dear Sir:

As discussed with the NRC on October 21, 1994, this letter is being submitted to request Enforcement Discretion (ED) to clarify the minimum reactor steam pressure for testing of the HPCI and RCIC systems. These systems are most conveniently tested at a pressure where the Electro Hydraulic Control (EHC) system is capable to respond and mitigate the pressure transients that result when either system is started. This pressure has historically been above 150, but below 175 psig.

PECO Energy Company (PECO Energy) is requesting that ED be granted, that would 1) approve surveillance requirement (SR) 3.5.1.9, from the Improved Technical Specifications (ITS, submitted September 29, 1994) as the low pressure testing requirement for the High Pressure Coolant Injection System (HPCI) system at PBAPS, 2) approve SR 3.5.3.4, from the ITS (submitted September, 29, 1994) as the low pressure Reactor Containment Isolation Cooling (RCIC) system testing requirement, and 3) amend the bases of the respective Technical Specifications to reflect these changes. This ED is requested to apply from October 20, 1994 at 1600 until a Technical Specification Change Request can be submitted and issued by the NRC.

In accordance with the guidance contained in Part 9900 of the NRC Inspection Manual, the following information is provided:

1) The Technical Specification (TS) or other license condition that will be violated.

TS Section 4.5.C.1.e states, "HPCI Subsystem testing shall be performed as follows:... (e) Flow Rate at 150 psig Steam Pressure"

TS Section 4.5.D.1.e states, "RCIC Subsystem testing shall be performed as follows:...(e) Flow Rate at approximately 150 psig Steam Pressure**." The indicated footnote to this section states, "The RCIC pump shall deliver at least 600 gpm for a system head corresponding to a reactor pressure of 1000 to 150 psig."

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2) The circumstances surrounding the situation, including the need for prompt action.

During start up testing of Unit 2 following the 10th refueling outage, the HPCI and RCIC surveillance testing procedures were reviewed, and it was recognized that the subject Technical Specification (TS) surveillance tests (ST) could be considered ambiguous. Similar concerns were raised during the 1990 Safety System Functional Inspection (NRC Inspection Report 90/200, Inspection Item 90-200-12.) When these concerns were raised in 1990, PECO Energy revised a then existing Plant Operation Review Committee (PORC) Position to address the immediate concerns with the ST. The PORC position recognized the specific value in the TS as a nominal value. This was done with consideration for the overlap of HPCI functional requirements with the low pressure systems. The PBAPS vintage of TS are not as precise as the standardized TS and did not specify ranges for what were intended to be nominal values for test parameters. Standardized TS do specify a range of values. For example, the Limerick Unit 1 TS for this test condition is greater than or equal to 200, +15, -0 psig. This PORC Position is still considered to be in effect; however, PBAPS now conservatively assumes that Enforcement Discretion is appropriate. Also at that time, a TS change was initiated to clarify the ST requirements for HPCI and RCIC; however, this change was deferred until Improved Technical Specifications (ITS) were issued. PECO Energy submitted a request to implement ITS on September 29, 1994, and the ST requirements for HPCI and RCIC, in the ITS, are clear and unambiguous.

Prompt action is being requested to avoid any unnecessary delays in plant start up.

3) The safety basis for the request that enforcement discretion be exercised, including an evaluation of the safety significance and potential consequence of the proposed course of action.

The HPCI and RCIC systems are high pressure systems used to mitigate the consequences of accidents. The RCIC system is not relied upon to mitigate the consequences of any design bases accidents, but rather, provides pressure and level control during isolation transients (i.e., Main Steam Line Isolation Valve Closure.) With the reactor at relatively low pressure the Low Pressure Coolant Injection (LPCI) system and Core Spray (CS) system provide adequate injection capability to maintain coolant inventory and mitigate the consequences of any low pressure design bases accidents.

4) Any proposed compensatory measures.

The low pressure injection systems (i.e., LPCI and Core Spray) have been tested and are currently operable. These systems will continue to be monitored and tested in accordance with the TS. The STs for the HPCI and the RCIC systems have been performed at a reactor pressure where the EHC system could mitigate the pressure transient caused by a HPCI or RCIC start. Both systems successfully passed their STs and were declared operable.

5) A justification for the duration of the ED.

This Enforcement Discretion is requested from 1600 on October 20, 1994 until a permanent TS change can be approved.

6) The basis for the licensee's conclusion that the non compliance will not be of potential detriment to the public health and safety and that a significant safety hazard is not involved.

The proposed ED to TS 4.5.C.1.e and 4.5.D.1.e does not involve a significant hazards consideration because operation of Peach Bottom Atomic Power Station with this change does not:

(1) involve a significant increase in the probability or consequences of an accident previously analyzed. The probability of a Loss of Coolant Accident (LOCA) is not affected by the pressure at which the ST for the HPCI and RCIC is performed. The consequences of previously analyzed accidents are unaffected because the low pressure injection systems (i.e., LPCI and CS) are available, and have been analyzed to mitigate the consequences of accidents at lower reactor pressures.

(2) create the possibility of a new or different type of accident from any accident previously evaluated. The requested ED does not effect any accident precursors, nor is any new equipment being added to the plant which could cause a new or different accident.

(3) involve a significant reduction in a margin of safety. The HPCI and RCIC systems are high pressure systems used to mitigate the consequences of accidents. The RCIC system is not relied upon to mitigate the consequences of any design bases accidents, but rather, provides pressure and level control during isolation transients (i.e., Main Steam Line Isolation Valve Closure.) With the reactor at relatively low pressure the Low Pressure Coolant Injection (LPCI) system and Core Spray (CS) system provide adequate injection capability to maintain coolant inventory and mitigate the consequences of any low pressure design bases accidents. Further, the impact on the SAFER/GESTR - LOCA, Loss of Coolant Accident Analysis of raising the minimum HPCI pressure from 150 to 175 psig is insignificant.

7) The basis for the licensee's conclusion that the non compliance will not involve adverse consequences to the environment.

The requested ED to the TS does not have an adverse environmental impact because the pressure at which the ST for HPCI and RCIC are performed does not increase either the quantity or likelihood of any environmental discharges.

The Plant Operational Review Committee has reviewed this proposed ED and has concluded that it does not involve a significant hazards consideration and will not endanger the health and safety of the public.

Sincerely,

G. A. Hunger, Jr.

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cc: T. T. Martin, Administrator, Region I, USNRC
W. L. Schmidt, Senior Resident Inspector, USNRC