

10CFR50.90

**PECO ENERGY**

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

May 9, 1995

Docket Nos. 50-277

50-278

License Nos. DPR-41

DPR-56

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

Subject: Peach Bottom Atomic Power Station, Units 2 and 3
Supplement 6 to TSCR 93-16
Conversion to Improved Technical Specifications

References: (1) Letter from G. A. Hunger, Jr. (PECO Energy) to USNRC dated
September 29, 1994

Dear Sir:

In Reference (1), PECO Energy Company submitted Technical Specifications Change Request (TSCR) 93-16, requesting changes to Appendices A and B of the Facility Operating Licenses for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. This TSCR proposed an overall conversion of the current PBAPS Technical Specifications (TS) to the Improved Technical Specifications (ITS), as contained in NUREG 1433, "Standard Technical Specifications, General Electric Plants, BWR/4."

Enclosed is our response to additional questions regarding ITS Section 5.0.

If you have any questions, please contact us.

Very truly yours,

G. A. Hunger, Jr.,
Director - Licensing

JLP/bgr

Affidavit, Enclosure

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

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COMMONWEALTH OF PENNSYLVANIA

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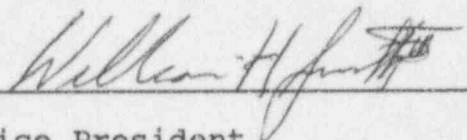
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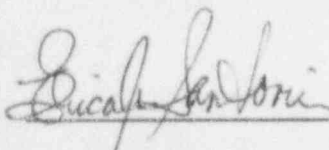
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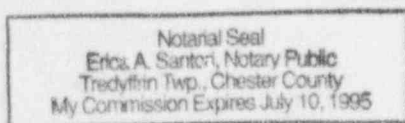
W. H. Smith, III, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company; the Applicant herein; that he has read the attached response to questions regarding Technical Specifications Change Request (TSCR 93-16, Supplement 6) for changes to the 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 9th day
of May 1995.


Notary Public



RESPONSES TO NRC COMMENTS (5.0)

Deviations from NUREG-1433

NRC Question 1:

Which ANSI/ANS Standard is Peach Bottom committed to with regard to license requirements for the Senior Manager-Operations? Please identify the location of the commitment.

PECO Energy Response to NRC Question 1:

The ANSI/ANS Standard that Peach Bottom Atomic Power Station (PBAPS) is committed to with regard to the license requirements for the Senior Manager-Operations is ANSI N18.1-1971. This commitment is located in Section 13.2.3.1 of the PBAPS UFSAR.

NRC Question 2:

Specification 5.5.4.f reads, "Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems shall be specified in the ODCM." NUREG-1433 contains a much greater level of detail concerning these limitations.

DOC P₁₂ reads, "The change to Section 5.5.4.f (old 5.4.2.4.f) specifies that limitations on the functional capability and use of liquid and gaseous effluent treatment systems shall be specified in the ODCM." This is simply a restatement of 5.5.4.f and not a justification for the deviation from NUREG-1433. Please provide a discussion of why the deviation from NUREG-1433 is justified.

PECO Energy Response to NRC Question 2:

The detail in NUREG-1433 regarding the limitations on the functional capability of the liquid and gaseous effluent treatment system was not incorporated into the PBAPS ITS since the limitations are not consistent with the Current Technical Specifications (CTS) limitations on the use of these effluent treatment systems. NUREG-1433 Specification 5.7.2.7.g states, "Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment,

RESPONSES TO NRC COMMENTS (5.0)

conforming to 10 CFR 50, Appendix I." Doses from both liquid and gaseous effluent are required to be projected by NUREG-1433 Specification 5.7.2.7.g. However, CTS 3.8.C, Gaseous Effluent, does not require dose contributions from gaseous radioactive effluent to be projected to ensure the appropriate portions of the systems are used to reduce releases.

Upon further review, it has been decided to revise proposed Specification 5.5.4.f to more closely reflect the requirements of the CTS. The proposed wording is as follows:

Limitations on the functional capability and use of the liquid effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when projected doses averaged over one month would exceed 0.12 mrem to the total body or 0.4 mrem to any organ (combined total from the two reactors at the site).

Gaseous effluents shall be processed through the appropriate gaseous effluent treatment systems as described in the ODCM prior to release.

NRC Question 3:

Specification 5.5.6 is not in conformance with Generic Change BWOG-09, C.17, Revision 2, to NUREG-1433. Please revise Specification 5.5.6 to conform to the generic change to the NUREG (see attached excerpt from the draft Revision 1 to NUREG-1433).

PECO Energy Response to NRC Question 3:

BWOG-09, C.17, Revision 2 was not approved at the time of the PBAPS submittal. Therefore, incorporation of the generic change in accordance with BWOG-09, C.17, Revision 2 has not been performed. PBAPS Specification 5.5.6, Inservice Testing Program, will be revised to reflect the requirements of Specification 5.5.7, Inservice Testing Program, of Revision 1 to NUREG-1433. One plant-specific deviation from the Inservice Testing Program frequencies in Specification 5.5.7.b of Revision 1 to NUREG-1433 will be made consistent with the PBAPS CTS. The deviation is to the Frequency of "Biennially or every 2 years." In Revision 1 to NUREG-1433, this Frequency is defined as "At least once per 731 days." The PBAPS CTS 1.0 in the definition of

RESPONSES TO NRC COMMENTS (5.0)

Surveillance Frequency specifies "24 months" as being "At least once per 732 days." As such, the PBAPS ITS Specification 5.5.6 Frequency of "Biennially or every 2 years" is proposed to be specified as "At least once per 732 days."

NRC Question 4:

Specification 5.5.7.f reads, "Demonstrate for the MCREV System that a laboratory test of a sample of the charcoal adsorber shows the halogen removal efficiency to be $\geq 99.5\%$." Please reconcile the difference between this ITS requirement and your CTS amendment request dated February 10, 1995, on this same subject.

PECO Energy Response to NRC Question 4:

Specification 5.5.7.f requires a sample of the charcoal filter to be analyzed once per year to assure halogen removal efficiency of at least 99.5%. This requirement is being deleted by PBAPS Technical Specification Change Request 95-02 dated 2/10/95 from G.A.Hunger, Jr. (PECO Energy) to NRC. In Revision A to TSCR 93-16, 4.ITS Specification 5.5.7.f will be proposed to be deleted to achieve consistency with the proposed CTS requirements for ventilation filter testing.

NRC Question 5:

Please refer to the question on this program submitted with the RAI on Section 3.8.

PECO Energy Response to NRC Question 5:

The responses to the NRC questions on this program are provided in the PECO Energy responses to the RAI on PBAPS ITS Section 3.8.

RESPONSES TO NRC COMMENTS (5.0)

CTS Comparison

NRC Question 1:

See Question 1 on Deviations from NUREG-1433 for Chapter 5.0

PECO Energy Response to NRC Question 1:

The ANSI/ANS Standard that Peach Bottom Atomic Power Station (PBAPS) is committed to with regard to the license requirements for the Senior Manager-Operations is ANSI N18.1-1971. This commitment is located in Section 13.2.3.1 of the PBAPS UFSAR.

NRC Question 2:

The CTS markup showed the revision of Specification 6.13 as change L₆. The markup did not appear to provide the new requirements which will be contained in the ITS. Please provide the new requirements for the CTS comparison document.

PECO Energy Response to NRC Question 2:

The CTS markup has been revised to show the new requirements which will be contained in the ITS. The Unit 2 CTS markup is attached. The Unit 3 CTS markup is identical.

NRC Question 3:

The CTS markup shows a change in SR 4.7.B.1.a from a pressure drop of 8 inches of water to 3.9 inches of water. The change is designated as M₆. The DOC for M₆ says "Not used." Please provide a DOC for this change.

PECO Energy Response to NRC Question 3:

DOC M₆ for ITS 5.0 will be revised in Revision A to TSCR 93-16 to reflect the information in the NSHC M₆ for ITS 5.0. A copy of the revised discussion of change is attached.

RESPONSES TO NRC COMMENTS (5.0)

NRC Question 4:

The CTS markup shows a change in SR 4.7.B.2.d to replace the phrase, "Testing of gasket seals for housing doors downstream of the HEPA filters and charcoal adsorbers" with "ASME N510-1989, Section 6." No change number is identified for this change. Please identify the appropriate change number if the DOC already exists or provide a DOC for this change.

PECO Energy Response to NRC Question 4:

ASME N510-1989, Section 6, requires the performance of duct and housing leak and structural capability tests of the ventilation system. As a result, this requirement adequately addresses the requirement of CTS SR 4.7.B.2.d. This markup should have been annotated as A₁₁. The markup will be revised to reflect this annotation.