

10CFR50.90



PECO ENERGY

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

August 11, 1995

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  
TSCR No. 93-16  
Conversion to Improved Technical Specifications

- References:
- (1) Letter from G. A. Hunger, Jr. (PECO Energy) to U. S. Nuclear Regulatory Commission (USNRC), dated September 29, 1994
  - (2) Letter from J. W. Shea (USNRC) to G. A. Hunger, Jr. (PECO Energy Company), dated July 20, 1995

Dear Sir:

In Reference (1), PECO Energy Company submitted Technical Specifications Change Request (TSCR) No. 93-16, requesting changes to Appendixes 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." In the Reference (2) letter, PECO Energy Company was requested to provide our anticipated implementation date and to submit final Technical Specifications pages. In response to this request, enclosed are proposed Technical Specifications and Bases.

The attached pages include revisions to resolve USNRC comments regarding High Radiation Areas. These revisions are contained in the Administrative Controls Chapter, Sections 5.7.1.d.3, 5.7.2.a.2, and 5.7.2.d.2. This change will require a radiation monitoring device that continuously transmits dose and cumulative dose information to a remote receiver. This is a change from the original submittal which required a monitoring device which continuously transmitted dose or cumulative dose information to a remote receiver. To implement this change, ITS pages 5.0-22 and 5.0-24 have been revised. In addition, the USNRC commented on the requirements for locked high radiation doors. To clarify this requirement, the exception to a high radiation area door being locked or guarded was expanded to include periods of equipment entry as well as the previously submitted exception to allow personnel entry. This results in a change to ITS page 5.0-23.

We have determined that these revisions do not alter our evaluation of any of the 10CFR50.59 standards, and therefore, do not affect our conclusion that these revisions to TSCR No. 93-16 do not constitute an unreviewed safety question. We have determined that the proposed revisions do not affect the conclusions of the No Significant Hazards Consideration and the Environmental Assessment.

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Additionally, one ITS open issue remains. This issue concerns the ITS Surveillance Requirements (SRs) for measuring the volume of the Emergency Diesel Generator (EDG) fuel oil in the day tanks and the storage tank. PECO Energy Company is reviewing this issue, and will promptly submit a certified revision to the appropriate portion of the ITS submittal when this issue is resolved.

PECO Energy Company believes that all ITS technical issues have been resolved, except for the EDG fuel oil issue. Therefore, PECO Energy Company requests that the License amendment be issued, with the implementation scheduled for no later than January 18, 1995. Until this amendment is implemented, the current Technical Specifications remain in effect.

If you have any questions, please contact us.

Very truly yours,

*M. C. Kray for*

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

Affidavit, Attachment

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

COMMONWEALTH OF PENNSYLVANIA

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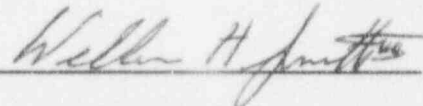
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COUNTY OF CHESTER

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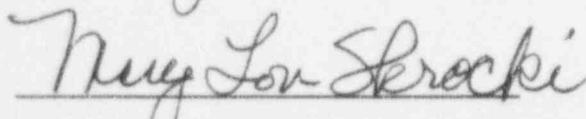
W. H. Smith, III being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company; the Applicant herein; that he has read this letter for 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.

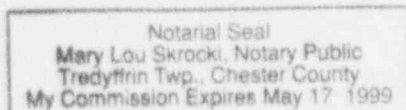


Vice President

Subscribed and sworn to  
before me this <sup>11<sup>th</sup></sup> day  
of August 1995.



Notary Public



Member, Pennsylvania Association of Notaries