

BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of	:	
	:	Docket Nos. 50-277
PHILADELPHIA ELECTRIC COMPANY	:	50-278

APPLICATION FOR AMENDMENT  
OF  
FACILITY OPERATING LICENSES  
DPR-44 & DPR-56

Edward G. Bauer, Jr.  
Eugene J. Bradley

2301 Market Street  
Philadelphia, Pennsylvania 19101

Attorneys for  
Philadelphia Electric Company

8403210055 840316  
PDR ADOCK 05000277  
P PDR

BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of	:	
	:	Docket Nos. 50-277
PHILADELPHIA ELECTRIC COMPANY	:	50-278

APPLICATION FOR AMENDMENT  
OF  
FACILITY OPERATING LICENSES  
DPR-44 & DPR-56

---

Philadelphia Electric Company, Licensee under Facility Operating License DPR-44 and DPR-56 for Peach Bottom Units 2 and 3, respectively, hereby requests that the Technical Specifications contained in Appendix A of the Operating License be amended by revising certain sections as indicated by a vertical bar in the margin of the attached page 240j. The requested change to the Technical Specifications would modify the Limiting Condition for Operation action statement for fire

barriers so as to reflect the guidance provided by the Standard Technical Specifications for General Electric Boiling Water Reactors, pages 7-33 and 7-34, and to revise the effective date of the Limiting Condition for Operation involving fire barriers required to ensure safe shutdown capability.

As currently stated in Technical Specification 3.14.D.3 (page 240j), a continuous fire watch must be established within one hour in the event a fire barrier is found to be non-functional. This specification does not take into account the recent installation of fire detection systems in most areas containing safety related equipment. The NRC's Standard Technical Specifications (STS) requires a continuous fire watch in areas without fire detection, and an hourly fire watch patrol in areas with operable fire detectors. The proposed amendment would revise the non-functional fire barrier action statement to permit the same fire watch options stated in the Standard Technical Specifications.

Additionally, Licensee requests deletion of the reference to the February 4, 1982 correspondence in the double asterisk footnote on page 240j. The program, currently nearing completion, was initiated in response to the design requirements

of 10 CFR 50, Appendix R, Section III.G. By correspondence dated February 10, 1984 (V. S. Boyer, Philadelphia Electric Company to D. G. Eisenhut, NRC) Licensee requested an exemption from the implementation schedule for the completion of the fire barrier upgrade program for reasons described therein. The proposed revision to the footnote would permit adjustments in the implementation schedule, as approved by the NRC, for the fire barrier upgrade program.

#### Significant Hazards Consideration Determination

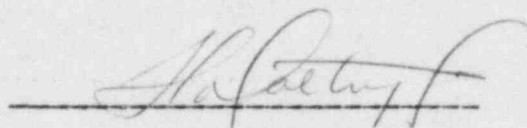
The amendment request establishes fire watch provisions that conform with the NRC position identified in the Standard Technical Specification, and reflect the recent fire protection improvements (fire detection and suppression systems) implemented at the Peach Bottom facility. The existence of fire detection systems complements a one-hour periodic fire watch patrol in lieu of a continuous fire watch. The revision to the footnote establishing the effective date of the fire barrier Limiting Condition for Operation permits a limited adjustment in the implementation schedule, as approved by the NRC, for completing the fire barrier improvements required by 10 CFR 50, Appendix R; and is therefore, administrative in nature. Consequently, these changes do not involve a significant hazards consideration since

they do not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

Pursuant to 10 CFR Section 170.22 "Schedule of Fees for Facility License Amendments," Philadelphia Electric Company proposes that this Application for Amendment be considered a Class III Amendment for Unit 2 and a Class I Amendment for Unit 3, since the proposed changes have acceptability for the issue clearly identified by an NRC position and are deemed not to involve a significant hazards consideration.

The Plant Operational Review Committee and the Nuclear Review Board (Off-site Safety Review Committee) have reviewed these proposed changes to the Technical Specifications, and have concluded that they do not involve an unreviewed safety question or a significant hazard consideration, and will not endanger the health and safety of the public.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "H. G. ...", is written over a horizontal line.

Vice President

COMMONWEALTH OF PENNSYLVANIA

:

COUNTY OF PHILADELPHIA

:

ss.

:

S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating Licenses 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.

*S. L. Daltroff*

Subscribed and sworn to  
before me this *14th* day  
of *March 1984*

*Patricia D. Scholl*  
Notary Public

PATRICIA D. SCHOLL  
Notary Public, Philadelphia, Philadelphia Co.  
My Commission Expires February 10, 1986