

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of

:
:
:

Docket No. 50-277
50-278

PHILADELPHIA ELECTRIC COMPANY

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

8502250062 850219
PDR ADOCK 05000277
P PDR

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of :
: Docket No. 50-277
: 50-278
PHILADELPHIA ELECTRIC COMPANY

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

Philadelphia Electric Company, Licensee under Facility Operating Licenses DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station Unit No. 2 and Unit No. 3, respectively, hereby requests that the Technical Specifications contained in Appendix A of the Operating Licenses be amended by revising certain sections as indicated by a vertical bar in the margin of the attached pages 206, 211 and 214. All of the revisions requested in this submittal concern the Radiological Effluent Technical Specifications issued August 3, 1984, as Amendment Nos. 102 and 104 to Peach Bottom Atomic Power Station, Unit Nos. 2 and 3, respectively. The Application requests the following changes:

(1) The current Technical Specification 4.8.B.3a on page 206 requires, in part, that a functional test be performed once/month to demonstrate that a downscale failure of the radwaste liquid effluent radiation monitor will automatically isolate the radwaste discharge valve and actuate the downscale failure alarm in the control room.

The radwaste liquid effluent rad monitor has two failure modes, the downscale failure and the INOP failure. The downscale failure occurs when the gross activity detected by the monitor decreases below a pre-set value. The INOP failure occurs when any one of the following conditions exists: (1) low voltage to the radwaste liquid effluent radiation detector, (2) radwaste liquid effluent rad monitor mode switch not in "operate", or (3) removal of any one of the plug-in modules in the radwaste liquid effluent rad monitor. Either failure mode actuates a common downscale/INOP alarm in the control room.

By design, a downscale failure of the radwaste liquid effluent rad monitor does not automatically isolate the radwaste discharge valve. An INOP failure, however, does automatically isolate the radwaste discharge valve.

Upon actuation of the common downscale/INOP alarm in the control room, the radwaste liquid effluent rad monitor front panel lights are checked to determine which failure mode actuated the alarm. If the INOP light on the monitor front panel is lit, the radwaste discharge valve is verified to be closed and an investigation is initiated to determine the cause of the INOP

failure. If the downscale light on the monitor front panel is lit, an investigation is initiated to determine the cause of the downscale failure. Technical Specification 3.8.B.3.d allows radwaste liquid effluent releases to continue when the radwaste liquid effluent rad monitor experiences a failure provided that best efforts are taken to make the rad monitor operable and that, prior to each release, two independent effluent samples are analyzed and two technically qualified members of the facility staff independently verify release rate calculations and discharge line valving.

Peach Bottom Surveillance Test, ST-4.5, Revision 3, is performed once/month for the purpose of verifying, in part, proper operation of the radwaste discharge valve. Steps 23 and 24 of ST-4.5 verify that an "INOP" condition will automatically isolate the radwaste discharge valve.

We request that the word "downscale" be changed to "INOP" in Technical Specification 4.8.B.3a.2 on page 206. This change is requested since the downscale failure does not automatically isolate the radwaste discharge valve and is justified since a downscale alarm is provided to alert the operator to the downscale condition and Technical Specification 3.8.B.3.d allows radwaste releases to continue when the radwaste liquid effluent rad monitor experiences a failure provided the requirements of this Technical Specification are met satisfactorily prior to each release. This change is requested as a result of an oversight in review of a previous Technical

Specification Amendment Application submittal concerning radioactive effluent materials.

(2) The current Technical Specification 4.8.C.6c on page 214 requires calibrating the recombiner hydrogen analyzers using a 1% hydrogen-balance nitrogen gas and a 4% hydrogen-balance nitrogen gas. As a result of a plant modification implemented prior to the effective date of Amendment Nos. 102 and 104, two new helium-immune hydrogen analyzers were installed in parallel with two of the existing hydrogen analyzers for the purpose of facilitating main condenser leak testing. The calibration gases required for the new helium-immune hydrogen analyzers are different from the calibration gases required for the existing hydrogen analyzers. The span gas used to calibrate the existing hydrogen analyzers is 4% hydrogen-balance nitrogen. However, the span gas required for the new helium-immune hydrogen analyzers is 2% hydrogen-balance air. Therefore, to properly calibrate both types of hydrogen analyzers, and to avoid listing the individual gas concentrations required for each type of hydrogen analyzer in the Technical Specifications, we are requesting a revision to page 214 of the Technical Specifications to delete 4.8.C.6c and to expand 4.8.C.6b to require the use of standard bottled hydrogen gas.

Peach Bottom Surveillance Tests ST-9.13 and ST-9.13A specify the method of calibration for the existing hydrogen analyzers and the helium-immune hydrogen analyzers, respectively. The effectiveness of the Technical Specifications is enhanced by limiting its scope to the essential operability and surveillance

requirements. The benefit of limiting the volume of the Technical Specifications was acknowledged in the NRC's proposed Rule change to 10 CFR 50.36, published March 30, 1982. For this reason, and considering the effectiveness of existing plant procedures, it is not appropriate to incorporate a listing of the various recombiner hydrogen analyzer calibration gases into the Technical Specifications.

(3) The current Technical Specification 4.8.C.4c on page 211 requires, in part, performing an instrument check on the main stack iodine and particulate sample flow rate monitors every day. The main stack sample flow rate monitors are located at the base of the main stack. In order to obtain access to this location, technicians must travel by vehicle to the Peach Bottom North Substation and obtain access through the security gates at the Substation. Due to the remote location of the main stack sample flow monitors, it is desirable to limit the number of excursions to the base of the main stack to once/week.

Peach Bottom Surveillance Test ST-7.6.1.f is performed once/week for the purpose of changing out the main stack sample flow filters. By limiting the frequency of the main stack sample flow monitor instrument check to once/week, both tasks (changing out the filters and performing the instrument check) could be accomplished simultaneously.

Additionally, an installed set of pressure switches already exists which actuate an alarm in the main control room in the event of main stack sample flow trouble and therefore compensates for the requested change in the surveillance frequency.

Therefore, we request that the frequency of the main stack sample flow monitor instrument check be changed from once/day to once/week. The attached Technical Specification 4.8.C.4c, page 211, indicates our proposed change.

Significant Hazards Consideration Determination

The Commission has provided guidance concerning the application of the standards for determining whether license amendments involve no significant hazards considerations by providing certain examples (48 FR 14870). One of the examples of actions involving no significant hazards consideration is a purely administrative change to Technical Specifications required as the result of an error. Amendment requests (1) and (3) of this submittal conform to this example. The errors are the result of an oversight in review of a previous Technical Specification amendment application submittal concerning radioactive effluent materials.

The proposed changes involving the recombiner hydrogen analyzer calibrations (Amendment Request 2) are required as the result of a plant modification implemented prior to the effective date of the Radiological Effluent Technical Specifications which

installed a new type of hydrogen analyzer in addition to the existing hydrogen analyzers. The new analyzer requires a different type of calibration gas than the existing analyzer. Therefore, a change to the Technical Specifications is required to allow proper calibration of both types of analyzers. The proposed change is justified by the benefits of limiting the volume of the Technical Specifications, and the effectiveness of existing plant procedures establishing the calibration requirements. This change conforms to example vi (48 FR 14870) of actions involving no significant hazards consideration since the results of the change are clearly within all acceptable criteria.

For these reasons, the amendment requests do not constitute 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.

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 hazards consideration and will not endanger the health and safety of the public.

Respectfully submitted,
PHILADELPHIA ELECTRIC COMPANY



Senior Vice President

COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF PHILADELPHIA :

V. S. Boyer, being first duly sworn, deposes and says:

That he is Senior 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.

V. S. Boyer

Subscribed and sworn to
before me this 15th day

of February 1985.

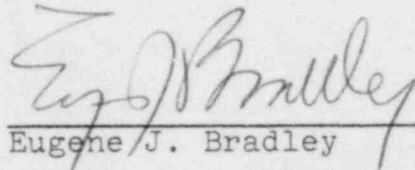
Patricia D. Scholl

Notary Public

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

CERTIFICATE OF SERVICE

I certify that service of the foregoing Application for Amendment was made upon the Commonwealth of Pennsylvania, by mailing a copy thereof, via first-class mail, to Thomas R. Gerusky, Director, Bureau of Radiological Protection, P.O. Box 2063, Harrisburg, PA 17120; all this 19th day of February, 1985.

A handwritten signature in cursive script, appearing to read "Eugene J. Bradley", is written over a horizontal line.

Eugene J. Bradley

Attorney for
Philadelphia Electric Company