

**PECO NUCLEAR**

A UNIT OF PECO ENERGY

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

August 27, 1996

Docket Nos. 50-277
50-278License Nos. DPR-44
DPR-56U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
License Change Application ECR 96-00565

Dear Sir:

PECO Energy Company (PECO Energy) hereby submits License Change Application ECR 96-00565, in accordance with 10CFR50.90, requesting changes to the Peach Bottom Atomic Power Station (PBAPS) Units 2 and 3 Facility Operating Licenses. The proposed changes correct an administrative error in the Technical Specifications (TS) concerning the Control Rod Drive (CRD) charging water header pressure for the Shutdown Margin (SDM) Test - Refueling.

Attachment 1 to this letter describes the proposed changes and provides justification for the changes including the basis for PECO Energy's determination that the proposed changes do not involve a significant hazards consideration. Attachment 2 provides marked-up TS pages indicating the proposed changes.

We request that, if approved, the amendment to the PBAPS Units 2 and 3 TS become effective within 30 days of issuance.

If you have any questions concerning this matter, please do not hesitate to contact us.

Very truly yours,

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

Enclosures: Affidavit, Attachment 1, Attachment 2

cc: H. J. Miller, 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 :

: ss.

COUNTY OF CHESTER :

D. B. Feters, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy; the Applicant herein; that he has read the enclosed License Change Application ECR 96-00565, for Peach Bottom Atomic Power Station, Unit 2 and Unit 3, Facility Operating License Nos. 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.

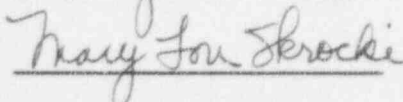


Vice President

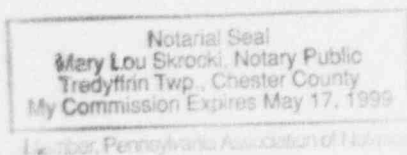
Subscribed and sworn to

before me this 27th day

of August 1996.



Notary Public



ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION
UNITS 2 AND 3

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

LICENSE CHANGE APPLICATION
ECR 96-00565

"Administrative Change to
CRD Charging Water Header Pressure"

Supporting Information - 2 Pages

Introduction

PECO Energy Company, Licensee under Facility Operating License DPR-44 for the Peach Bottom Atomic Power Station (PBAPS), Unit 2, and DPR-56 for PBAPS, Unit 3, requests that the Technical Specifications (TS) contained in Appendix A to the Operating Licenses be amended to provide for an administrative change to TS 3.10.8 "Shutdown Margin (SDM) Test - Refueling." The marked-up pages indicating the proposed changes are provided in Attachment 2. This License Change Application provides a discussion and description of the proposed changes, a safety assessment, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

Discussion and Description of the Proposed Changes

The proposed changes involve revising Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.10.8, "Shutdown Margin (SDM) Test - Refueling" to change the minimum allowable Control Rod Drive (CRD) charging water header pressure from a value of 955 psig to a value of 940 psig. Technical Specifications (TS) Change Request 95-12 was submitted to the U.S. Nuclear Regulatory Commission (USNRC) on November 30, 1995, and provided technical justification for changing the minimum allowable control rod scram accumulator pressure and charging water header pressure from a value of 955 psig to a value of 940 psig. The USNRC issued Amendments Nos. 211 and 216 to the PBAPS, Units 2 and 3, TS on January 11, 1996, which revised the TS as requested in TS Change Request 95-12.

TS Change Request 95-12 was incomplete by inadvertently failing to identify the need to change requirement (f) of LCO 3.10.8 for CRD charging water header pressure from 955 psig to 940 psig. TS Change Request 95-12 did identify the need to change Surveillance Requirement (SR) 3.10.8.6 and the corresponding discussion of SR 3.10.8.6 in the TS Bases. A change to LCO 3.10.8 is needed to eliminate the discrepancy between requirement (f) and SR 3.10.8.6 since it would now be possible to meet SR 3.10.8.6, but not maintain compliance with LCO 3.10.8.

Therefore, we propose that PBAPS, Units 2 and 3, LCO 3.10.8 requirement (f) be revised to reflect the CRD charging water header pressure contained in TS Amendments Nos. 211 and 216.

Safety Assessment

The proposed changes do not involve any physical changes to plant systems, structures, or components (SSC), or the addition of new SSC. The proposed changes are purely administrative, and therefore have no impact on any safety analysis assumptions. LCO 3.10.8 is only applicable during Mode 5 with the reactor mode switch in startup/hot standby position.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed changes to the PBAPS, Units 2 and 3 ITS, which will revise LCO 3.10.8 requirement (f), do not involve a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three (3) standards set forth in 10CFR50.92 is provided below:

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes are purely administrative and do not involve any physical changes to plant SSC. The change in the minimum CRD charging water header pressure from 955 psig to 940 psig was previously approved in TS Amendments Nos. 211 and 216 for PBAPS, Units 2 and 3. TS Change Request 95-12 was incomplete by inadvertently failing to identify the need to change requirement (f) of LCO 3.10.8. Therefore, the proposed changes will not increase the probability of occurrence or the consequences of an accident previously evaluated in the SAR.

2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes are purely administrative and do not involve any physical changes to plant SSC. The proposed changes do not allow plant operation in any mode that is not already evaluated in the SAR. Therefore, the possibility of a different type of accident than previously evaluated in the SAR is not created.

3. The proposed changes do not involve a significant reduction in a margin of safety.

The proposed changes are purely administrative and have no impact on any safety analysis assumptions or margins of safety. A change to SR 3.10.8.6 was approved by the NRC by TS Amendment Nos. 211 and 216. LCO 3.10.8 requirement (f) should have been changed at the same time to reflect a minimum CRD charging water header pressure of 940 psig. Changing LCO 3.10.8 requirement (f) to reflect TS Amendment Nos. 211 and 216 is purely administrative, and therefore does not involve a reduction in a margin of safety.

Information Supporting an Environmental Assessment

An environmental assessment is not required for the changes proposed by this License Change Application because the changes conform to the criteria for "actions eligible for categorical exclusion," as specified in 10CFR51.22(c)(9). The proposed changes will have no impact on the environment. The proposed changes do not involve a significant hazards consideration as discussed in the preceding section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The proposed changes do not authorize any change in the authorized power level of the facility. In addition, the proposed changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed the proposed changes and have concluded that the changes do not involve an unreviewed safety question and will not endanger the public health and safety.