

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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October 5, 1992

NUCLEAR SERVICES DEPARTMENT

Docket Nos. 50-211  
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  
Technical Specifications Change Request 92-01


Dear Sir:

Philadelphia Electric Company (PEC) hereby submits Technical Specifications Change Request (TSCR) No. 92-01, in accordance with 10 CFR 50.90, requesting a change to Appendix A of the Peach Bottom Facility Operating Licenses. The proposed changes concern the addition of a primary containment isolation valve to Technical Specifications Table 3.7.1 and 3.7.4. This new primary containment valve is required as a result of a modification to install a Hardened Torus Vent. The vent, which was previously analyzed in accordance with 10 CFR 50.59, is being installed in response to Generic Letter 89 - 16 and is scheduled to be completed in the fall of 1992 for Unit 2 and the fall of 1993 for Unit 3. As discussed with the NRC Project Manager, we are requesting the proposed changes be approved to support this schedule.

Attachment 1 to this letter describes the proposed changes, and provides justification for the changes. Attachment 2 contains the revised Technical Specification pages.

If you have any questions regarding this matter, please contact us.

Very truly yours,

  
G. J. Beck, Manager  
Licensing Section

Enclosures: Affidavit, Attachment 1, Attachment 2

cc: T. T. Martin, Administrator, Region I, USNRC  
080001 J. Lyash, USNRC Senior Resident Inspector, PBAPS  
T. M. Gerusky, Commonwealth of Pennsylvania

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COMMONWEALTH OF PENNSYLVANIA:

: SS.

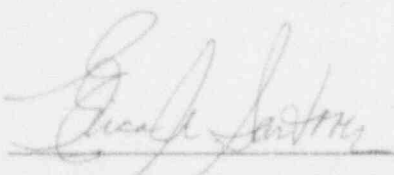
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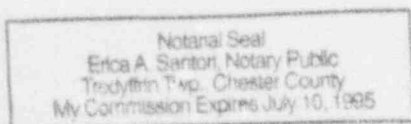
G. R. Rainey, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company;  
the Applicant herein; that he has read the attached Technical  
Specifications Change Request (Number 92-01) for 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>5th</sup> day  
of October 1992.

  
Notary Public



ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION  
UNITS 2 AND 3

Docket Nos. 50-277  
50-278

License Nos. DPR-44  
DPR-6

TECHNICAL SPECIFICATION CHANGE REQUEST  
92-01

"Addition of a Torus Hardened Vent  
Primary Containment Isolation Valve"

Supporting Information for Changes 3 Pages

Docket Nos. 50-277  
50-278

License Nos. DPR-44  
DPR-56

Philadelphia Electric Company (PECo), Licensee under Facility Operating Licenses DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station (PBAPS) Unit No. 2 and Unit No. 3, respectively, requests that the Technical Specifications contained in Appendix A to the Operating Licenses be amended. Proposed changes to the Technical Specifications are indicated by vertical bars in the margin of pages 181a and 187. The proposed revised pages 181a and 187 for each unit are included in Attachment 2.

The proposed changes are administrative in nature and concern the addition of a primary containment isolation valve to the Technical Specification (TS) table 3.7.1 and 3.7.4. As part of the Mark I Containment Improvement Program, the NRC issued Generic Letter 89-16 requesting licensees to consider the installation of a hardened vent from the wetwell air space under the provisions of 10 CFR 50.59. After discussions between the NRC and the BWR Owners' Group (BWROG), criteria were developed to comply with the recommendations of the Generic Letter. The main objective of the vent, as detailed in the criteria, is to mitigate the consequences of a long term loss of decay heat removal (the TW Sequence). This TW sequence is currently beyond the plant licensing basis and assumes that with the exception of the residual heat removal system, all other systems are operational and the core is not in a degraded condition.

To respond to the TW sequence PECO's design will utilize a 16" line connected to the existing 18" pipe between primary containment isolation valves AO-2(3)511 and AO-2(3)512. This modification was approved against 10 CFR 50.59 criteria as suggested in Generic Letter 89-16. A new 16" air operated butterfly valve, AO-8(9)0290, and 16" rupture disc will be installed in series in the new piping system for each unit. This Technical Specification Change Request is being submitted to add the new 16" isolation valve to the TS tables 3.7.1 and 3.7.4. These two tables define the operability and testing requirements of primary containment isolation valves.

We request that the proposed changes be approved by the end of the up coming refuel outage to support the completion of the modification for Unit 2. The Unit 3 modification is scheduled for the fall of 1993. If this request is approved before the modification is complete, the newly revised pages will be inserted into the controlled copies of TS; however, the actual TS testing of the valves will not begin until the modification is complete and the valves are declared in service.

#### Description of Charges

The design of the Torus Hardened Vent has been analyzed in accordance with 10 CFR 50.59 (as recommended by the NRC in Generic Letter 89-16) and it has been determined that an unreviewed safety question is not involved. The proposed changes to the Technical

Specifications are administrative in nature. The definition of a primary containment valve and the testing requirements of such valves are clearly delineated in 10 CFR 50 Appendices A and J and therefore, including these valves in the TS Tables is merely an administrative step taken to ensure compliance with the requirements of 10 CFR 50.

- (1) The Licensee proposes that Tables 3.7.1 be revised to include the Torus Hardened Vent Containment Isolation Valve. Section 3.7.D defines the operability requirements for the Primary Containment Isolation Valves listed in the Table 3.7.1. The table lists the parameters that must be met for the valve to be considered operable. For the new 16" valve these parameters include a normally closed position and no initiation signal.
- (2) The Licensee proposes that Table 3.7.4 be revised to include the Torus Hardened Vent Valve. Section 4.7.A defines the leak rate testing requirements for the Primary Containment Isolation Valves listed in the Table 3.7.4. The table includes a list of valves, the penetration number and the type of testing that is required. This new valve is subject to the requirements of 10 CFR 50 Appendix J and therefore should be included in Table 3.7.4.

#### Safety Discussion

The design of the Torus Hardened Vent has been analyzed in accordance with 10 CFR 50.59 as recommended by the NRC in Generic Letter 89-16. This safety discussion is therefore limited to the effects of adding the valve to the Technical Specifications and will not discuss the effects of adding the valve to the plant.

Change Request (1) proposes to add the Torus Hardened Vent Valve to the existing table of valves that are required to be operable to maintain primary containment integrity. Table 3.7.1 will be revised to include the name of the new valve, and the valve's normal position. Since the valve is normally closed, fails closed and will be keylocked closed, it will be listed as normally closed and will not receive any automatic isolation signals. Table 3.7.1 defines the valves that are subject to the operability requirements of Section 3.7.D and the surveillance requirements of Section 4.7.D. The proposed change would assure that the existing Licensing Basis for Primary Containment Valves is maintained and that the hardened vent valve would be in its proper position during all plant conditions. This request would add a valve to the list of existing valves that are subject to the operability and testing requirements delineated in TS sections 3.7.D and 4.7.D. No new



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tests or requirements are being added that could have an impact on the safe operation of PBAPS.

Change Request (2) proposes to add the Torus Hardened Vent Valve to the list of valves that are subject to 10 CFR 50 Appendix J testing requirements. These requirements apply to this valve because the Torus Hardened Vent Valve will be a primary containment valve as described in 10 CFR 50 Appendix A. This request would add this valve to the list of existing valves that are subject to the testing requirements delineated in TS sections 4.7.A. No new tests or requirements are being added that could have an impact on the safe operation of PBAPS.

#### No Significant Hazards Consideration

The two change requests proposed in this Application do not constitute a significant hazards consideration in that:

- i) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because they do not affect operation, equipment, or a safety related activity and are hence administrative in nature. Thus, these administrative changes cannot affect the probability or consequences of any accident.
- ii) The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated because these changes are purely administrative and do not affect the plant. Therefore, these changes cannot create the possibility of any accident.
- iii) The proposed changes do not involve a significant reduction in a margin of safety because the changes do not affect any safety related activity or equipment. These changes are purely administrative in nature and do not affect the margin of safety.

#### Environmental Assessment

An environmental impact assessment is not required for the changes proposed by this Application because the changes conform to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22(c)(9).

#### Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes and have concluded that they do not involve an unreviewed safety question and are not a threat to the health and safety of the public.

ATTACHMENT 2

PEACH BOTTOM ATOMIC POWER STATION  
UNITS 2 AND 3

Docket Nos. 50-277  
50-278

License Nos. DPP-44  
DPR-56

TECHNICAL SPECIFICATION CHANGES

List of Attached Pages

<u>Unit 2</u>	<u>Unit 3</u>
181a	181a
187	187