

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

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Philadelphia Electric Company, Licensee under Facility Operating Licenses DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station Unit Nos. 2 and 3, respectively, hereby requests that the Technical Specifications incorporated 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 1, 214 and 215, and by the addition of new page 214a which is also attached hereto and incorporated herein by reference.

The revision requested to page 1 concerns the definition of Alteration of the Reactor Core. Secondary containment

integrity is maintained when alterations to the reactor core are in progress. During certain circumstances, all reactor fuel is removed from the reactor vessel. An assessment for the need for secondary containment integrity during in-core maintenance with all fuel removed has been made. It was determined that the Technical Specification Core Alteration definition does not recognize nor should it apply to alterations which occur within the reactor vessel when there is no fuel in the reactor vessel. This determination is based on the fact that the 'Core' is non-existent with no fuel present in the vessel. The proposed revision on page 1 provides clarification of the definition and is consistent with the definition in the Commission's Standard Technical Specifications which states, "Core Alteration shall be the addition, removal, relocation or movement of fuel, sources, incore instruments or reactivity controls within the reactor pressure vessel with the vessel head removed and fuel in the vessel. Suspension of Core Alterations shall not preclude completion of the movement of a component to a safe conservative position," for General Electric Boiling Water Reactors.

The revisions requested to pages 214 and 215 concern the Limiting Conditions of Operation for the hydrogen concentration in the offgas recombiner system and associated hydrogen analyzers. The Licensee requests the following changes.

- (1) The current Technical Specification Section 3.8.C.6 requires that the concentration of hydrogen downstream

of the recombiners shall be limited to less than or equal to 2% by volume. Technical Specification Section 3.8.C.6.a, on page 214, further states that if the concentration of hydrogen downstream of the recombiner becomes greater than 2%, but less than or equal to 4% by volume, the concentration must be restored to 2% within 48 hours. Technical Specification Section 3.8.C.6.b states that if the concentration of hydrogen downstream of the recombiner exceeds 4% by volume, an orderly reduction of power shall be initiated within one hour to bring the concentration of hydrogen downstream of the recombiner to less than or equal to 2% by volume.

Philadelphia Electric Company has replaced the Unit 2 compressed storage offgas system (mechanical compressors and pressurized holdup pipe) with a low pressure ambient charcoal delay system consisting of a cooler condenser/moisture separator, guard bed, main adsorber bed, and glycol cooling equipment. The compressed storage delay system (pressurized holdup pipe) was not detonation resistant downstream of the mechanical compressors due to the high operating pressure (approximately 200 psig). As modified, the holdup pipe of the system (which is partially filled with charcoal) operates at essentially atmospheric pressure and is, therefore, detonation resistant. In addition, the potential for a hydrogen detonation has been reduced due

to the elimination of many active components from the gas stream. Since the new system is designed to withstand hydrogen detonation, we request that the Technical Specification Section 3.8.C.6.a be revised to modify the time required to restore the concentration of hydrogen downstream of the recombiner to less than or equal to 4% by volume. This criteria is consistent with the Standard Technical Specifications for General Electric Boiling Water Reactors (NUREG-0473, Rev. 2, page 11-16) for systems designed to withstand a hydrogen explosion.

Therefore, we request that Technical Specification Sections 3.8.C.6 and 3.8.C.6.a be revised to modify the limit of the concentration of hydrogen downstream of the recombiners to less than or equal to 4% by volume, and delete current Technical Specification Section 3.8.C.6.b.

- (2) The current Technical Specification Section 3.8.C.6.c on page 214 requires two hydrogen monitors downstream of the recombiner to be operable during power operation. In addition, Technical Specification Section 3.8.C.6.d allows continued operation for 14 days in the event the number of operable hydrogen monitors are one less than required, provided grab samples are taken and analyzed

every 4 hours.

With replacement of the compressed storage delay offgas system with an ambient charcoal treatment system, which is designed to withstand a hydrogen detonation, the requirement to initiate system isolation when high hydrogen concentrations are detected no longer exists. Upon removal of the mechanical compressors, the hydrogen analyzers will be utilized only as an alarm function. One out of two analyzers in service is adequate to meet the requirements of Section 11.3, Gaseous Waste Management, Subsection II.B.6 of the Commission's Standard Review Plan, which states that the process gas stream should be analyzed and potentially explosive mixtures annunciated. The proposed change is also consistent with the Commission's NUREG-0473, Revision 2, "Radiological Effluent Technical Specifications for BWR's."

Therefore, we request that the Technical Specifications be revised to require one hydrogen monitor downstream of the recombiner operable during power operation.

In addition, we request that the Technical Specifications be revised to allow operation to continue up to 30 days with the number of hydrogen monitors operable less than required provided that grab samples are taken and analyzed every 4 hours during power .

operation. This change is also consistent with the Commission's Standard Technical Specifications previously referenced.

The Licensee requests that the existing Technical Specification Sections 3.8.C.6 through 3.8.C.6.d and Sections 4.8.C.6.a through 4.8.C.6.c on pages 214 and 215 be relocated onto the new page 214a of the Technical Specifications. In addition, the revised Technical Specification Sections 3.8.C.6, 3.8.C.6.a, 3.8.C.6.b, and 3.8.C.6.c, will also be located on new page 214a, with the asterisked note stating that these new sections of the Technical Specifications take effect upon completion of the installation of the ambient charcoal treatment system. The purpose for locating the existing Technical Specification Sections 3.8.C.6 through 3.8.C.6.d and Sections 4.8.C.6.a through 4.8.C.6.c and the revised Technical Specification Sections 3.8.C.6 through 3.8.C.6.c on the same new page is to minimize the potential for operator error which could occur if these sections were located on separate pages.

Significant Hazards Consideration Determination

The proposed changes to the Technical Specification Section 3.8.C.6 constitute revisions to a limiting condition for operation to reflect improvements in the system design. The

proposed addition of the words "with the vessel head removed and fuel in the vessel" to the "Alteration of the Reactor Core" definition provides clarification consistent with its intent of avoiding fuel damage. 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: (vii) A change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations. The proposed changes to Technical Specification Section 3.8.C.6 most closely fit this example of an action not involving a significant hazards determination since they are in compliance with the Commission's Standard Technical Specifications and Standard Review Plan.

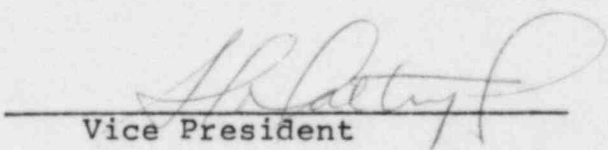
Consequently, the proposed changes do not:

- (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

By


Vice President

COMMONWEALTH OF PENNSYLVANIA :

: SS.

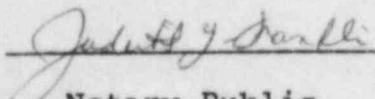
COUNTY OF PHILADELPHIA :

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.



Subscribed and sworn to
before me this 21st day
of MAY, 1985

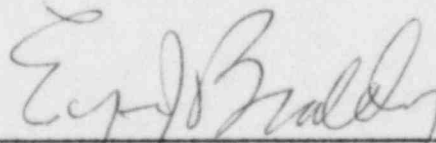


Notary Public

JUDITH Y. FRANKLIN
Notary Public, Phila., Phila. Co.
My Commission Expires July 28, 1987

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 23rd day of May, 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