

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of

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:

Docket Nos. 50-277
50-278

PHILADELPHIA ELECTRIC COMPANY

APPLICATION FOR AMENDMENT

OF

FACILITY OPERATING LICENSES

DPR-44 & DPR-56

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Philadelphia Electric Company

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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 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 attached pages 7, 8, 38, 39, 42, 45, 49, 62, 63, 63a and 80.

The requested changes to the Technical Specifications would allow modifications to the reactor protection system such that scram signals which are the result of main steam line isolation valve closure or main condenser low vacuum are bypassed when the mode switch is not in the RUN position. These scrams are presently bypassed when the mode switch is not in RUN concurrent with reactor pressures less than 600 psig.

The purpose of these modifications is to accommodate proper prewarming of the turbine in accordance with current General Electric Company turbine startup procedures. This startup procedure requires a turbine rotor temperature above 120 degrees Farenheit whenever the turbine speed is above 100 rpm. To ensure these conditions, a main condenser vacuum of 15 inches Hg or lower is required. The current scram setpoint of greater than 23 inches Hg for low condenser vacuum is bypassed whenever the reactor pressure is less than 600 psig (with the mode switch not in RUN). Therefore, in order to maintain condenser vacuum lower than the scram setpoint to support the turbine warmup requirement, it is often necessary to delay reactor pressurization, or if delays in turbine startup are encountered, it may be necessary to depressurize the reactor to below 600 psig.

The existing scram which results from either low condenser vacuum or main steam line isolation valve closure coincident with reactor pressure greater than 600 psig when in either shutdown, refueling or startup modes was originally included in the design not as a limiting safety system setting,

but rather to compensate for operational difficulties at BWR 1 plants. Tests conducted at a BWR 4 plant (Peach Bottom is a BWR 4) indicate there are no unacceptable operating regions when the reactor was operated "bottled-up" at pressures well in excess of 600 psig. These conclusions are supported by General Electric Report No. NEDO-20697, "Bottled-up Operation of a BWR", dated November 1974. Further, the Standard Technical Specifications for General Electric Boiling Water Reactors, NUREG-0123, do not include this scram requirement.

The instruments which provide the inputs which are proposed above to be deleted from the Technical Specifications for the reactor protection system also provide an input into the Primary Containment Isolation System for control of the isolation valves for the feedwater flush system. The design prevents the opening of these valves and also closes the valves when the reactor pressure is above 600 psig. For this reason, Licensee further proposes to modify Table 3.2.A and its notes, pages 62 and 63, and Table 4.2.A, page 80, to include these instruments. The surveillance and check frequency utilized are consistent with the function of this instrumentation and will provide the assurance of functionality. Page 63a is added for Unit 2 and modified for Unit 3 in order to accommodate information relocated from page 63.

Licensee further requests deletion of obsolete footnotes on pages 42 and 45. These footnotes concern changes which were made pending completion of modifications or tests and provide the clarification necessary during the changeover period. These

modifications and testing have been completed; therefore, removal of the footnotes is appropriate.

Significant Hazards Consideration

The license amendment, which would permit proper turbine warmup operations with the reactor pressure greater than 600 psig, does not affect the established limiting safety system setting contained on page 12 of the Technical Specifications which remains intact in the RUN mode.

The Commission has provided guidance concerning the application of the standards for determining whether license amendments involve no significant hazards consideration by providing certain examples (48 FR 14870). An example (iv) of actions involving no significant hazards consideration is a change granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation was not yet demonstrated. The proposal to delete the scram signal for main condenser low vacuum and main steam line isolation valve closure, for operating modes other than the RUN mode, fits this example since the acceptability for the change has been established by General Electric Report, NEDO-20697, "Bottle-Up Operation of a BWR", dated November 1974, and the Standard Technical Specifications for General Electric BWR, NUREG-0123. Another example (ii) of actions involving no significant hazards consideration is a change that constitutes an additional limitation, restriction, or control not presently

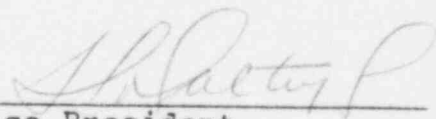
included in the Technical Specifications. The proposal to add the reactor pressure feature to the Primary Containment Isolation instrumentation LCO and surveillance requirements fits this example since it imposes additional operating and testing requirements. Considering that the elimination of this scram signal does not affect any existing safety limits and that additional operating and testing requirements are proposed, the amendment does not constitute a significant hazards consideration since it does 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 Operating Review Committee and the Nuclear Review Board (off-site safety review committee) have reviewed the 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.

Respectively 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.

S. L. Daltroff

Subscribed and sworn to

before me this *17th* day

of *July* 1985

Patricia D. Scholl

Notary Public

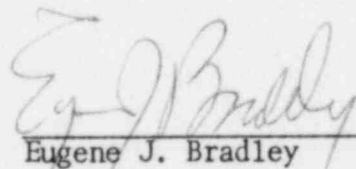
PATRICIA D. SCHOLL

Notary Public, Philadelphia, Philadelphia Co.

My Commission Expires February 10, 1986

CERTIFICATE OF SERVICE

I certify that service of the foregoing Application 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 17th day of July, 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

1.0 DEFINITIONS (Cont'd)

outage, the required surveillance testing need not be performed until the next regularly scheduled outage.

Run Mode - In this mode the reactor system pressure is at or above 850 psig and the reactor protection system is energized with APRM protection (excluding the 15% high flux trip) and RBM interlocks in service.

Safety Limit - The safety limits are limits below which the reasonable maintenance of the cladding and primary systems are assured. Exceeding such a limit requires unit shutdown and review by the Nuclear Regulatory Commission before resumption of unit operation. Operation beyond such a limit may not in itself result in serious consequences, but it indicates an operational deficiency subject to regulatory review.

Secondary Containment Integrity - Secondary Containment integrity means that the reactor building is intact and the following conditions are met:

1. At least one door in each access opening is closed.
2. The standby gas treatment is operable.
3. All Reactor Building ventilation system automatic isolation valves are operable or deactivated in the isolation position.

Shutdown - The reactor is in a shutdown condition when the reactor mode switch is in the shutdown mode position and no core alterations are being performed.

Shutdown Mode - Placing the mode switch to the shutdown position initiates a reactor scram and power to the control rod drives is removed. After a short time period (about 10 sec), the scram signal is removed allowing a scram reset and restoring the normal valve lineup in the control rod drive hydraulic system; also, the main steam line isolation scram and main condenser low vacuum scram are bypassed.

1.0 DEFINITIONS (Cont'd)

Simulated Automatic Actuation - Simulated automatic actuation means applying a simulated signal to the sensor to actuate the circuit in question.

SITE BOUNDARY - That line beyond which the land is not owned, leased or otherwise controlled by licensee.

Source Check - A source check shall be the qualitative assessment of channel response when the channel sensor is exposed to a radioactive source.

Startup/Hot Standby Mode - In this mode the reactor protection scram trips, initiated by condenser low vacuum and main steam line isolation valve closure are bypassed, the reactor protection system is energized with IRM neutron monitoring system trip, the APRM 15% high flux trip, and control rod withdrawal interlocks in service. This is often referred to as just Startup Mode. This is intended to imply the Startup/Hot Standby position of the mode switch.

Surveillance Frequency - Periodic surveillance tests, checks calibrations, and examinations shall be performed within the specified surveillance intervals. The operating cycle interval as pertaining to instrument and electrical surveillance shall not exceed 18 months. These specified time intervals may be exceeded by 25%. In cases where the elapsed interval has exceeded 100% of the specified interval, the next surveillance interval shall commence at the end of the original specified interval.

Surveillance tests are not required on systems or parts of the systems that are not required to be operable or are tripped. If tests are missed on parts not required to be operable or are tripped, then they shall be performed prior to returning the system to an operable status.

Transition Boiling - Transition boiling means the boiling regime between nucleate and film boiling. Transition boiling is the regime in which both nucleate and film boiling occur intermittently with neither type being completely stable.

Trip System - A trip system means an arrangement of instrument channel trip signals and auxiliary equipment required to initiate