

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

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

AMENDMENT TO
AUGUST 6, 1981
APPLICATION FOR AMENDMENT
OF
FACILITY OPERATING LICENSE
DPR-44 & DPR-56

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On August 6, 1981, Philadelphia Electric Company submitted an Application for Amendment of Facility Operating Licenses DPR-44 and DPR-56 requesting several revisions, including a change to Technical Specification 3.7.A.4.b (pages 170 and 171) regarding the drywell-suppression chamber vacuum breakers. The proposed change would recognize the current practice of performing a verification test in the event that position lights do not confirm a vacuum breaker to be in the fully closed position. At a February 26, 1985, meeting to discuss the Application, the NRC staff requested several changes

in the proposed specification. These changes dealt with the need to specify the time restraints for both the initial and periodic verification tests following detection of a "not fully seated" position indication for a drywell-suppression chamber vacuum breaker. Further, the NRC staff expressed a concern that the provision in Specification 3.7.A.4.b to permit operation with one vacuum breaker in the "3 degrees" open position did not provide sufficient conservatism.

Accordingly, Philadelphia Electric Company, Licensee under Facility Operating Licenses DPR-44 and DPR-56 for Peach Bottom Power Station Unit No. 2 and Unit No. 3, respectively, hereby amends its Application of August 6, 1981, by deleting a part of its Application and substituting therefore updated pages 170 and 171, and new page 171a to accommodate a redistribution of material, which are attached hereto and incorporated herein by reference. The proposal would incorporate the following changes:

1. Delete the provision permitting continuous operation with one drywell-suppression chamber vacuum breaker in the position between "fully closed" and "3 degrees open".
2. Require initiation of the bypass area leakage test within 8 hours of detection of a "not fully seated" position indication.

3. Require a bypass area leakage test within 24 hours following the operability test of vacuum breakers if a "not fully seated" position indication exists.
4. Require periodic bypass area leakage tests for the duration of a "not fully seated" position indication.

The bypass area leakage test is the same test as the one performed to verify Technical Specification 4.7.A.4.d that the drywell-to-suppression chamber bypass flow path is less than or equivalent to a one-inch diameter hole. This test is performed by a pressure differential between the suppression chamber and the drywell (suppression chamber at a slight vacuum and the drywell at a slight positive pressure). The rate of rise in suppression chamber pressure is used to calculate the size of the bypass opening. A calculated bypass area of less than one-inch diameter confirms the fully seated condition of all drywell-to-suppression chamber vacuum breakers.

Licensee requests that implementation of the new surveillance requirements take effect two months after issuance of the amendment to accommodate the writing and approval of implementing procedures.

Further, Licensee requests several minor editorial and typographical corrections as indicated by a vertical bar in the margin of the attached pages.

Significant Hazards Consideration Determination

The proposed revisions impose additional Limiting Conditions for Operation and surveillance requirements on the drywell-suppression chamber vacuum breakers that reduce the potential for bypass leakage between the suppression chamber and the drywell. The Commission has provided guidance for the application of the standards for determining whether a significant hazards consideration exists by providing examples of amendments that are considered not likely to involve significant hazards consideration (48 FR 14870). One such example (ii) of an action involving no significant hazards consideration is a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specification. The changes proposed by this application fit this example.

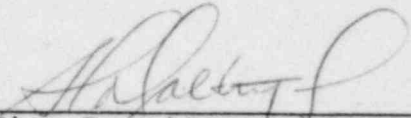
The proposed change does not involve a significant increase in the probability of consequences of an accident previously evaluated since the additional testing requirements provide added confidence that the drywell-to-suppression chamber bypass flow path is within limits. For the same reason, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change to preclude long-term operation with one drywell-suppression chamber vacuum breaker in the position between "fully closed" and "3 degrees open" enhances the margin of safety since the potential for some bypass leakage is

reduced. Consequently, the change does not involve a significant reduction in a margin of safety.

The Plant Operational Review Committee and the Nuclear Review Board 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

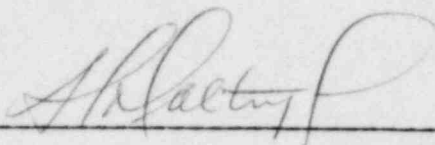
COMMONWEALTH OF PENNSYLVANIA :

: 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 ^{2nd} day
of *December* 1985

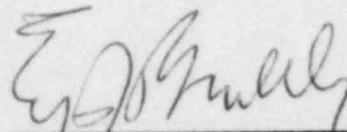
Patricia D. Scholl

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 Amendment to Philadelphia Electric Company's August 6, 1981 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 2nd day of December, 1985.



Eugene J. Bradley

Attorney for
Philadelphia Electric Company