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*NRC Project Director:* Phillip F. McKee.

*PECO Energy Company, Public Service Electric and Gas Company, Delmarva Power and Light Company, and Atlantic City Electric Company, Dockets Nos. 50-277 and 50-278, Peach Bottom Atomic Power Station, Units Nos. 2 and 3, York County, Pennsylvania*

*Date of application for amendments:* February 10, 1995.

*Description of amendment request:* The proposed changes provide for the correction of administrative errors made in the past during the processing of technical specification changes related to control room ventilation filter surveillance testing.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because the changes are purely administrative and do not involve any physical changes to plant SSC [systems, structures, or components]. Therefore, these changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because the changes will not alter the plant or the manner in which the plant is operated. The changes do not allow plant operation in any mode that is not already evaluated in the safety analysis. The changes will not alter assumptions made in the safety analysis and licensing bases. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed changes do not involve a significant reduction in a margin of safety because they are purely administrative and have no impact on any safety analysis assumptions.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

*Local Public Document Room location:* Government Publications Section, State Library of Pennsylvania, (REGIONAL DEPOSITORY) Education

Building, Walnut Street and Commonwealth Avenue, Box 1601, Harrisburg, Pennsylvania 17105.

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*NRC Project Director:* John F. Stolz.

*Pennsylvania Power and Light Company, Docket Nos. 50-387 and 50-388, Susquehanna Steam Electric Station, Units 1 and 2, Luzerne County, Pennsylvania*

*Date of amendment request:* March 15, 1994.

*Description of amendment request:* This amendment would reflect an exemption from 10 CFR Part 50, Appendix J, Section II.H.4, concerning the scope of Type 'C' testing on specified emergency core cooling system and reactor core isolation cooling containment isolation valves by revising Technical Specification Table 3.6.3-1, Primary Containment Isolation Valves. The subject valves on systems which terminate below the minimum water level of the suppression pool and are associated with closed systems would be tested using requirements of the American Society of Mechanical Engineers' Section XI Code.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

I. This proposal does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to the scope of Type 'C' testing for the subject valves does not affect the probability of the design basis accidents. The valves will continue to be maintained in an operable state, and in their current design configuration. There is no correlation between the scope of the Type 'C' testing and accident probability.

PP&L reviewed the postulated consequences of design basis events on primary containment isolation under the proposed change. GDC 50 design conformance states that the primary containment structure, including access openings, penetrations and the containment heat removal system, is designed so that the containment structure and its internal compartments can withstand, without exceeding the design leakage rate (1.0% per day), the peak accident pressure and temperature that could occur during any postulated LOCA.

For the purposes of considering the consequences of LOCAs under the proposed change, a single active failure of a CIV or a passive failure of the closed system were

reviewed, within the limits of the existing licensing basis. Under the existing licensing basis, a pipe rupture of seismically qualified ECCS piping does not have to be assumed concurrent with the LOCA, except if it is a consequence of the LOCA. Consequential failures can be eliminated, since a LOCA inside containment is separated from the ECCS piping by the containment structure. Consequential failures of the ECCS piping from LOCA's outside containment are outside the Appendix J design considerations, although they are adequately addressed through the redundancy and separation of the ECCS design. A single active failure of the CIV, under the LOCA condition, can be accommodated since the closed and filled system piping remains as the leakage barrier. The ECCS passive failure criterion does require consideration of system leaks, but not pipe breaks, beyond the initiating LOCA. Pipe leakage, equivalent to the leakage from a valve or pump seal failure, should be considered at 24 hours or greater post-LOCA. The capability to make-up inventory to the suppression pool is adequate to ensure that postulated seat leakage and pipe leakage does not result in a condition that jeopardizes pool level. Make-up capability exists to the suppression pool via the Condensate Storage Tank and Spray Pond. Actions to make-up to the suppression pool are delineated in Emergency Operating Procedures.

Therefore, the proposal to eliminate the subject Type 'C' tests does not involve a significant increase in the probability or consequences of an accident previously evaluated.

II. This proposal does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The acceptability of the proposed change to the scope of Type 'C' testing for the subject valves is based on maintaining the existing barriers to primary containment leakage, and ensuring that the suppression pool level is assured for 30 days during all design basis, post-accident modes of operation. By meeting these dual objectives, the plant response to the design basis events will be unchanged, and no new accident scenarios will be encountered. These two objectives are related, in that, the suppression pool inventory creates a passive barrier to primary containment atmospheric leakage for penetrations which are located below the minimum water level of the pool. The subject valve lines terminate below the minimum suppression pool water level.

The subject valves are all single isolation valves associated with lines that penetrate the primary containment, but are not connected directly to the primary containment atmosphere or the reactor coolant pressure boundary. The redundant isolation boundary for each of the affected valves is the closed system associated with the valve. This configuration is described in General Design Criteria (GDC) 57. The proposed exemption, and Technical Specification change, does not alter the configuration of these systems. The valves will continue to be tested and maintained to ensure their operability. The closed system