

From: [Tobin, Jennifer](#)
To: [Helker, David P.\(GenCo-Nuc\)](#)
Cc: [Gropp Jr, Richard W.\(Exelon Nuclear\)](#); [Mascitelli, Francis J.\(Exelon Nuclear\)](#); [Danna, James](#)
Subject: Peach Bottom Units 2 and 3 - Request for Additional Information - TSTF-500 Implementation LAR (EPID L-2018-LLA-0265)
Date: Tuesday, August 20, 2019 11:58:00 AM
Attachments: [image002.png](#)
[image004.png](#)

Dear Mr. Helker,

By application dated June 7, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19158A312), Exelon Generation Company, LLC (Exelon, the licensee) requested an amendment to the Renewed Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The license amendment request (LAR) would revise the Technical Specifications (TS) 3.8.4, "DC Sources - Operating," to add a condition for the opposite unit consistent with Nuclear Regulatory Commission (NRC)-approved Technical Specifications Task Force (TSTF)-500, Revision 2, "DC [direct current] Electrical Rewrite – Update to TSTF-360." Specifically, the proposed condition would allow a 72-hour-CT for an opposite unit battery charger that is required for particular plant configurations.

The Nuclear Regulatory Commission's (NRC) staff is reviewing your submittal and has determined that additional information is needed to complete its review. The specific request for additional information (RAI) question is provided below. A clarification phone call was held on August 20, 2019. No changes were made to the draft RAI (as shown below) as a result of the call. Your response is requested by September 20th in order to allow sufficient review time to meet your expedited review request for this license amendment (December 31, 2019).

If you have any questions, please contact me at (301) 415-2328.

Thanks,
Jenny

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3
REQUEST FOR ADDITIONAL INFORMATION REGARDING LICENSE AMENDMENT REQUEST TO
REVISE TECHNICAL SPECIFICATIONS 3.8.4 CONSISTENT WITH TECHNICAL SPECIFICATION TASK
FORCE (TSTF) -500, REVISION 2, "DC ELECTRICAL REWRITE – UPDATE TO TSTF-360"
NRC DOCKET NOS. 50-277 AND 50-278

By application dated June 7, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19158A312), Exelon Generation Company, LLC (Exelon, the licensee) requested an amendment to the Renewed Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The license amendment request (LAR) would revise the Technical Specifications (TS) 3.8.4, "DC Sources - Operating," to add a condition for the opposite unit consistent with Nuclear Regulatory Commission (NRC)-approved Technical Specifications Task Force (TSTF)-500, Revision 2, "DC [direct current] Electrical Rewrite – Update to TSTF-360," (ADAMS Accession No. ML092670242). Specifically, the proposed condition would allow a 72-hour-CT for an opposite unit battery charger that is required for particular plant configurations.

Title 10 of the *Code of Federal Regulations*, Part 50 (10 CFR 50), Section 36, "Technical Specifications," requires, in part, that the operating license of a nuclear production facility include TS. 10 CFR 50.36 (c)(2) requires that the TS include limiting conditions for operation (LCOs) which are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met.

RAI-1

The licensee proposed a new TS 3.8.4 Condition B with associated Required Actions and Completion Times (CT) for the required opposite unit battery charger. The licensee stated that the word "required" denotes that only specific batteries from the opposite unit are required to support operation of the unit for particular plant

configurations.

The proposed new Unit 2 TS 3.8.4 Condition B with associated Required Actions and CT would state.

<u>B. One required Unit 3 battery charger on one subsystem inoperable.</u>	<u>B.1 Restore Unit 3 battery terminal voltage to greater than or equal to the minimum established float voltage.</u>	<u>12 hours</u>
	AND	
	<u>B.2 Verify battery float current < 2 amps.</u>	<u>Once per 12 hours</u>
	AND	
	<u>B.3 Restore battery charger to OPERABLE status.</u>	<u>72 hours</u>

The proposed new Unit 3 TS 3.8.4 Condition B with associated Required Actions and CT would state:

<u>B. One required Unit 2 battery charger on one subsystem inoperable.</u>	<u>B.1 Restore Unit 2 battery terminal voltage to greater than or equal to the minimum established float voltage.</u>	<u>12 hours</u>
	AND	
	<u>B.2 Verify battery float current < 2 amps.</u>	<u>Once per 12 hours</u>
	AND	
	<u>B.3 Restore battery charger to OPERABLE status.</u>	<u>72 hours</u>

The NRC staff has identified the following discrepancy:

Both the 12 hour-CT for Required Action B.1 and the initial 12-hour CT for Required Action B.2 start when Condition B is entered. If the battery terminal voltage was restored to greater than or equal to the minimum established float voltage within 12 hours (Required Action B.1), the battery would be on the exponential charging current portion of its recharging cycle at the end of the 12 hours. It appears that there would be no time remaining for the battery charging current to decrease to less than or equal to 2 amperes (amps) within the same 12 hours (i.e., initial 12-hour CT for Required Action B.2).

The staff requests the following information to address this discrepancy:

Provide a discussion to demonstrate that the required battery can be fully recharged with a charging current of less than 2 amps within the initial 12 hours from entry into Condition B (Required Action B.2) after the required battery terminal voltage is restored to greater than or equal to the minimum established float voltage at the end of 12 hours from entry into Condition B (Required Action B.1).