

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4000

October 3, 1979

Re: Rocket Nos.: 50-277
50-278

IE Bulletin 79-14

Mr. Boyce H. Grier, Director
Office of Inspection & Enforcement
Region I
United States Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Reference: (1) Telephone conversation from R. LaGrange
and S. Hofsfor (DOR Engineering Branch)
to W. M. Alden, Engineer-In-Charge -
Generation Division/Nuclear Section

Dear Mr. Grier:

This letter is in response to the verbal request (Reference
1) for additional information pertaining to Item 1 in Bulletin
79-14.

1. Piping identified with accessibility code "C" runs between
the various structures in the plant and is buried
underground. We have reviewed the piping isometrics to
specifically identify the piping that is buried and, as a
result, have revised the tabulation that was submitted to
the NRC with the 30-day response. The revised tabulation is
attache. The specific piping that is buried is as follows:

a. Condensate Service System

- (1) Piping common to the Unit 2 HPCI, RCIC and core
spray pump suction and on the HPCI and RCIC

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pump discharges from the Unit 2 condensate storage tank to the Turbine Building.

- (2) Piping common to the Unit 3 HPCI, RCIC and core spray pump suctions and on the HPCI and RCIC pump discharges from the Unit 3 condensate storage tank to the tunnel underneath the Recombiner Building. The piping in this tunnel, however, is accessible only when both units are off.

b. High Pressure Service Water System

- (1) Pump discharge piping to the RHR heat exchangers from the Pump Structure to the Turbine Building.
- (2) Piping downstream of the RHR heat exchangers from the Units 2 and 3 Reactor Buildings to the Diesel Generator Building.

c. Emergency Service Water System

- (1) Pump discharge piping to the Reactor Building cooling water heat exchangers, safeguard equipment room coolers, and diesel generator coolers between:
 - (a) the Pump Structure and the Turbine Building,
 - (b) the Pump Structure and the Diesel Generator Building,
 - (c) the Turbine Building and the Diesel Generator Building, and
 - (d) the Units 2 and 3 Reactor Buildings and the Diesel Generator Building.
- (2) Piping downstream of the Reactor Building cooling water heat exchangers and safeguard equipment room coolers from the Units 2 and 3 Reactor Buildings to the Diesel Generator Building.

d. Emergency Cooling System

- (1) Emergency service water piping downstream of the RHR heat exchangers from the Diesel Generator Building to the Emergency Cooling Tower and to the discharge pond.

- (2) Emergency cooling pump discharge piping to the reactor building cooling water heat exchangers and safeguard equipment room coolers (connecting to Emergency Service Water piping) from the Emergency Cooling Tower to the Units 2 and 3 Reactor Buildings.
 - (3) Emergency service water booster pump discharge piping from the Diesel Generator Building to the Emergency Cooling Tower.
 - (4) Piping from the Emergency Cooling Tower to the Intake Structure.
2. As a result of the work performed to satisfy the requirements of IE Bulletin 79-04, it was discovered that the CRD return line outside containment was not seismically qualified. A seismic boundary anchor was added to the piping and the piping between containment penetration N-36 and the new anchor was analyzed to meet seismic requirements. The piping between the penetration and the anchor was measured to provide 'as-built' dimensions for the reanalysis. The piping on Unit 2 has no supports between penetration N-36 and the new anchor and it passes through one open floor penetration. The clearance through the floor penetration was not measured, however, the movement of the piping during a seismic event will not be significant enough for the clearance to be a concern. It was verified that there was space between the pipe and the penetration.

The piping on Unit 3 is anchored where it passes thru a wall close to primary containment penetration N-36. The piping was reanalyzed from the anchor thru the wall to the new seismic boundary anchor. This piping passes through no other walls or floors and contains only two rod hangers which were reviewed. Neither the Unit 2 or Unit 3 piping contain power-operated valves and there are no welded attachments to the piping except for the seismic boundary anchor which was recently installed. We consider that the elements of IE Bulletin 79-14 have been satisfied for this piping.
3. Valve weights and valve/operator centers of gravity are taken into consideration by reviewing the information contained in vendor drawings against the input to the seismic calculation.
4. Penetrations are inspected for 'as-built' conditions including the type of penetrations and measurement of clearances.

Mr. Boyce H. Grier

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5. Measurements are made to at least one support outboard of the outboard isolation valve.

Very truly yours,



M. J. Cooney
Superintendent
Generation Division/Nuclear

cc: United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Division of Reactor Operations Inspection
Washington, DC 20555

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TABULATION OF PEACH BOTTOM SAFETY-RELATED PIPING
PER FSAR TABLE A.9.1

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<u>Piping Description</u>	<u>Stress Isometric No.</u>	<u>Revision</u>	<u>Accessible (A)/ Inaccessible (I)</u>	<u>Inspection Code</u> (See below)
<u>Main Steam System</u>				
Reactor to Containment Penetration	731 E 799	1	I	B
	730 E 756	7	I	B
	729 E 153	8	I	B
Containment Penetration to Outboard Isolation Valve	SK-M-711	A	I	B
	SK-M-712	A	I	B
Drains to Containment Penetration	SK-M-725	B	I	B
Drains Penetration to Outboard Isolation Valve	SK-M-725	B	I	B

Reactor Recirculation System

Reactor to Recirc Pump Suction	731 F 386	1	I	B
	730 E 116	7	I	B
	153 F 769	5	I	B
	730 E 117	4	I	B
Recirc Pump Discharge to Reactor	"	1	I	B

CRD Hydraulic System

Return Line - Reactor to Containment Penetration	SK-M-891	B	I	B
Return Line - Penetration to Outboard Isolation Valve	This piping has been "as-built" and reanalyzed within the last 12 months and therefore does not need to be inspected per Bulletin 79-14.			
Scram Discharge Volume & Headers			A	A
Insert and Withdrawal Lines			A,I	A,B

Inspection Code: A - within 60 days
B - within 120 days
C - cannot be inspected (no physical access possible)

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TABULATION OF PEACH BOTTOM SAFETY-RELATED PIPING
PER FSAR TABLE A.9.1

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<u>Piping Description</u>	<u>Stress Isometric No.</u>	<u>Revision</u>	<u>Accessible (A)/ Inaccessible (I)</u>	<u>Inspection Code</u> (See below)
<u>Feedwater</u>				
Reactor to Containment Penetration	SG-6-1S		I	B
Containment Penetration to Outboard Isolation Valve	SG-6-3S		I,A	B,A
<u>Inerting System</u>				
Containment Penetration N-25 to 2nd Isolation Valve	SK-M-709	A	A	A
	SK-M-710	A	A	A
	2-9-4		A	A
	2-9-9		A	A
	3-9-4		A	A
Containment Penetration N-26 to 2nd Isolation Valve	2-9-4		A	A
Suppression Pool Penetration N-219 to 2nd Isolation Valve	2-9-9		A	A
<u>Residual Heat Removal System</u>				
Suppression Pool and Recirculation Piping to Pump Suction	SG-10-4S		A	A
	SG-10-7S		A	A
	SG-10-8S		A	A
Pump Discharge to Reactor Head Spray	SG-10-9S		A,I	A,B
	SG-10-5S		I	B
Pump Discharge to Containment Spray Header & Recirc. Piping	SG-10-6S		A,I	A,B
	SG-10-9S		A,I	A,B

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TABULATION OF PEACH BOTTOM SAFETY-RELATED PIPING
PER FSAR TABLE A.9.1

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Pump Discharge to Torus (Test Line)	SG-10-3S		A	A
Fuel Pool Skimmer Surge Tanks to RHR Pump Suction	SG-10-1S		A	A
RHR Pump Discharge Header To Waste Collector Surge Tanks	SG-10-2S		A	A
<u>Standby Liquid Control System</u>				
Tanks to Pump Suction	SK-M-724 (Unit 2)	A	A	A
	HISO-1151 (Unit 3)	A	A	A
<u>Reactor Water Clean-up System</u>				
From RHR Shutdown Cooling Supply To Outboard Isolation Valve	HISO-1209 (Unit 2)	A	I	B
	HISO-1265 (Unit 3)	A	I	B
	SG-12-4S		I	B
<u>Reactor Core Isolation Cooling System</u>				
Steam Supply from "C" Main Steam Line to RCIC Turbine	SK-M-774	A	I,A	B,A
	SK-M-773 (Unit 3)	A	A	A
	SK-13-1S (Unit 2)		I,A	B,A
Turbine Exhaust to Suppression Pool	SG-13-2T (Unit 2)		A	A
	SK-M-979 (Unit 3)	B	A	A
Pump Suction from Suppression Pool and Condensate Storage Tank	SK-M-756	A	A	A
	SK-M-767	A	A	A
	SK-M-768	A	A	A
	SK-M-770		A	A
	SG-23-3S		A	A

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Pump Discharge to Feedwater Piping Suppression Pool, and Condensate Storage Tank (including Reactor Water Clean-up Regenerative Heat Exchanger)	SG-13-3S (Unit 2) SK-M-757 (Unit 3) SK-M-758 (Unit 3) SG-12-2T	A A	A,I A A,I I	A,B A A,B B
RCIC Pump Suction to Torus Water Clean-up Pump Suction	SK-M-1000		A	A
<u>Core Spray Cooling System</u>				
Pump Suction from Suppression Pool and Condensate Storage Tank	SG-14-2T SK-M-1010 SK-M-1011 SG-14-5S		A A A A	A A A A
Pump Discharge to Reactor Vessel Sparger and to Suppression Pool	SG-14-1S SG-14-4S SG-14-6S SK-M-750 SK-M-755	A	I A I,A A A	B A B,A A A
<u>Radwaste System</u>				
Drywell Sump Pump Discharges Outside Containment	SK-M-741 SK-M-742	A A	A A	A A
<u>High Pressure Coolant Injection System</u>				
Steam Supply from "B" Main Steam Line to HPCI Turbine	SK-M-772 SK-M-771 SG-23-1S	A A	A A,I A	A A,B A
Turbine Exhaust to Suppression Pool	SK-M-753 SG-23-2S	A	A A	A A

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<u>Piping Description</u>	<u>Stress Isometric No.</u>	<u>Revision</u>	<u>Accessible (A)/ Inaccessible (I)</u>	<u>Inspection Code</u> (See below)
Pump Suction from Suppression Pool and Condensate Storage Tank	SK-M-770 SG-23-3S	A	A A	A A
Pump Discharge to Feedwater Piping, Suppression Pool and Condensate Storage Tank	SK-M-766 SK-M-769 SG-23-4S	A A	A A A, I	A A A, B
<u>High Pressure Service Water System</u>				
Pump Discharge to RHR Heat Exchangers	SK-M-714 SK-M-715 SK-M-716 SK-M-717 SK-M-718 SK-M-719	A A A A A A	A, I A, I A A A A	A, C A, B, C A A A A
RHR Heat Exchangers to Discharge Pond and Emergency Cooling System	SK-M-721 SK-M-722 SK-M-723	A A A	A, I A, I A, I	A, C A, C A, C
<u>Condensate Service System</u>				
From Condensate Storage Tank to HPCI, RCIC and Core Spray Pump Suctions	HISO-2751	A	A, I	A, C
From HPCI and RCIC Pump Discharges To Condensate Storage Tank	Unnumbered Sketch dated 3/12/69		A, I	A, C
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<u>Emergency Service Water</u>				
Diesel Generator Heat Exchangers	SG-33-1S		A, I	A, C
Supply and Return	SG-33-2S		A, I	A, C
Emergency Service Water Pumps	SK-M-727	A	A, I	A, C
Discharges				
Supply to Reactor Building Cooling	SK-M-729	A	A, I	A, B, C
Water Heat Exchangers and Safeguard	SK-M-730	A	I	B, C
Equipment Room Coolers	SK-M-731	A	A, I	A, C
	SK-M-732	A	A	A
	SK-M-733	A	A	A
	SK-M-734	A	A	A
	SK-M-735	A	A	A
	SK-M-736	A	A	A
	SK-M-737	A	A	A
	SK-M-738	A	A, I	A, C
	SK-M-739	A	A, I	A, C
Emergency Service Water Piping in	SK-M-784	A	A	A
Diesel Generator Building	SK-M-785	A	A	A
	SK-M-786	A	A	A
<u>Emergency Cooling System</u>				
Emergency Service Water Booster Pumps	SK-M-1005		A, I	A, C
Discharge				
Cooling Water to Emergency Cooling	SK-M-790	A	A, I	A, C
Cooling Towers	SK-M-791	A	A	A
Emergency Cooling Water Pump Discharge	SK-M-787	A	A, I	A, C

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