

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

(215) 841-5001

June 3, 1982

Docket Nos. 50-277  
50-278

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

SUBJECT: Response to Generic Letter 82-10 (Post TMI  
equirements)

Dear Mr. Eisenhut:

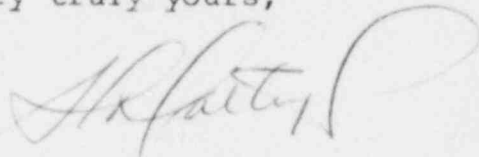
This letter transmits information requested in Generic Letter No. 82-10, D. G. Eisenhut to All Licensees of Operating Power Reactors, dated May 5, 1982, concerning implementation of selected NUREG-0737, TMI Action Plan Requirements. Information regarding these NUREG-0737 items is presented in the enclosure to this letter. The proposed implementation dates represent our current estimates for completion of the work, and may be revised at a later date for reasons beyond our control; such as delays in equipment delivery or unforeseen mechanical problems.

Should you have any questions regarding this matter, please do not hesitate to contact us.

Very truly yours,

Enclosure

cc: C. J. Cowgill



A046

COMMONWEALTH OF PENNSYLVANIA :

: SS.

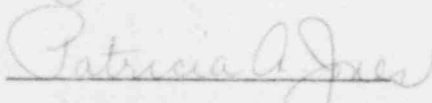
COUNTY OF PHILADELPHIA :

S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, that he has read the foregoing letter dated June 3, 1982, and the enclosed thereto, providing the information requested in Generic Letter 82-10 (D. G. Eisenhower to All Licensees of Operating Power Reactors, dated May 5, 1982); that he knows the contents thereof; and that the statement 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 <sup>4<sup>th</sup></sup> day  
of June, 1982



Notary Public

PATRICIA A. JONES  
Notary Public, Media Boro, Delaware Co.  
My Commission Expires Sept. 13, 1982

ENCLOSURE

STATUS OF NUREG-0737 ITEMS REQUESTED  
BY GENERIC LETTER 82-10  
PEACH BOTTOM UNITS 2 AND 3

(1) Item I.A.1.3.1 Limit Overtime

NRC Schedule: October 1, 1982

Requirement: Revise administrative procedures to limit overtime in accordance with NRC Policy Statement issued by Generic Letter No. 82-02, dated February 8, 1982.

Response

We plan to implement a new overtime policy in June, 1982 as described in correspondence dated April 22, 1982 (S. L. Daltroff, PECO. to D. G. Eisenhut, NRC.) for shift operating personell, and health physics and chemistry technicians that complies with the NRC overtime policy identified in Generic Letter No. 82-02. The new Peach Bottom policy will supercede the policy implemented on March 31, 1981 in response to the original NRC overtime policy for these plant personnel. The Peach Bottom overtime policy for other personnel is as described in correspondence dated March 31, 1981, S. L. Daltroff, PECO. to D. G. Eisenhut, NRC and as approved by the NRC in correspondence dated February 6, 1982, J. F. Stolz, NRC to E. G. Bauer, Jr., PECO. We conclude that Peach Bottom is in full compliance with the NRC directives on this issue.

(2) I.A.1.3.2 Minimum Shift Crew

NRC Schedule: July 1, 1982

Requirement: Augment current shift staffing to conform with minimum levels set forth on page 3-9 of NUREG-0737.

Response:

The Peach Bottom Operating License has required for many years an operating shift that complies with the criteria set forth on page 3-9 of NUREG-0737.

(3) I.C.1 Revised Emergency Procedures

NRC Schedule: First refueling after October 1, 1982

Requirement: Revise emergency procedures

Response:

NUREG-0737 requires licensees to revise and implement emergency procedures at the first refueling outage after NRC approval of the guidelines. The emergency procedure guidelines (EPGs) developed by the BWR Owners' Group are currently pending NRC approval. Therefore, it is appropriate to alter the schedule for implementation of the emergency procedures to be the first refueling outage commencing at least six months after NRC approval of the guidelines, as requested in correspondence dated May 14, 1982 (S. L. Daltroff, PECO. to D. G. Eisenhut, NRC).

We have drafted new emergency procedures based on a recent draft of revision 2 of the EPGs. Training of the Peach Bottom operators using these new procedures was started in March, 1982. Our current plan is to implement the new procedures later this year following completion of the operator training. We believe the content of Revision 2 of the EPGs permits significant improvements to be incorporated into the Peach Bottom emergency procedures, and that these improvements should be expedited in the interest of enhancing operator response to plant transients and accidents. The procedures will be revised further as needed to reflect the final NRC approved EPGs.

(4) II.B.1 Reactor Coolant System Vents

NRC Schedule: First refueling after July 1, 1982

Requirement: Install vents in accordance with revised 10CFR44 dated December 2, 1981.

Response

Your letter indicated that no reply was needed on this issue. However, we wish to note that in correspondence dated April 29, 1982, J. F. Stolz, NRC to E. G. Bauer, Jr., PECO., the NRC concurred with our evaluation that the existing systems at Peach Bottom are sufficient to meet the requirements of NUREG-0737, Item II.B.1 and are therefore acceptable.

(5) II.K.3.18 Automatic Depressurization System Actuation

NRC Schedule: September 30, 1982

Requirement: Submit revised position on need for modification.

Response

By letter dated March 26, 1982 (S. L. Daltroff, PECO. to D. G. Eisenhut, NRC) we concurred with the BWR Owners' Group proposal to submit a revised study by September 30, 1982. We are therefore in agreement with the NRC schedule.

(6) II.K.3.30 & 31 Small-Break LOCA Analysis

NRC Schedule: One year after staff approval of model

Requirement: Submit plant specific analysis

Response

NUREG-0737, Item II.K.3.30 requires General Electric to confirm that their small break LOCA model complies with 10CFR, Part 50, Appendix K, and to address specific NRC concerns contained in NUREG-0626. By letter dated June 26, 1981 (R. H. Buchholz, General Electric to D. G. Eisenhut, NRC), General Electric concluded that their model is acceptable relative to the concerns of Item II.K.3.30. Item II.K.3.31 requires plant specific analyses of small breaks using NRC approved models. Resolution of these requirements is dependent upon the NRC's review and response to General Electric's June 26, 1981 submittal.

(7) III.A.1.2 Staffing Levels for Emergency Situation

NRC Schedule: July 1, 1982

Requirement: Provide for augmentation of staffing in accordance with Generic Letter 81-10 dated February 18, 1981.

Response

Philadelphia Electric proposed an alternative to the NRC staffing criteria that meets the intent of Generic Letter 81-10 (letter dated April 3, 1981, J. W. Gallagher, PECO. to D. G. Eisenhut, NRC). Following their review of our proposal, the NRC staff requested additional information regarding our exception to the 30 minute augmentation for emergency staffing (letter dated December 24, 1981, R. C. Haynes, NRC to V. S. Boyer, PECO.). By letter dated February 2, 1982 (V. S. Boyer, PECO. to R. C. Haynes, NRC), we provided additional information to confirm compliance with the intent of the NRC staffing criteria. Part of the basis for the alternative staffing proposal was our commitment to assign additional personnel to the on-shift complement in lieu of 30-minute shift augmentation. The July 1, 1982 staffing improvements, as committed to in the April 3, 1981 letter, were implemented earlier this year. The acceptability of the Peach Bottom emergency staffing will be demonstrated during the graded exercise of the Peach Bottom Emergency Plan on June 16, 1982.

(8) III.A.1.2 Upgrade Emergency Support Facilities

NRC Schedule: October 1, 1982

Requirement: Complete modifications

Response

The emergency support facilities have been completed as described in correspondence dated June 1, 1982 (S. L. Daltroff, PECO. to D. G. Eisenhut, NRC) and are currently operational. The acceptability of the facilities for performing their intended functions will be demonstrated during the upcoming NRC Emergency Drill scheduled for June 16, 1982.

(9) III.A.2.2 Meteorological Data

NRC Schedule: October 1, 1982

Requirement: Complete modification

Response

A description of the new meteorological monitoring system associated with the Class A dose model, currently planned for Peach Bottom and a request for an adjustment in its implementation schedule were provided in a May 6, 1982 letter (S. L. Daltroff, PECO. to D. G. Eisenhut, NRC). Since the revision of Regulatory Guide 1.23 has not been issued, much of the design criteria was not clarified until recently during informal discussions with the NRC staff. This situation delayed the initial engineering of the system. For this reason, the finalized software and hardware design, procurement, and installation necessary to satisfy the regulatory guide, NUREG-0654, and NUREG-0737 cannot be completed on the schedule identified in Generic Letter 82-10. For these reasons, we request that the implementation date be extended until January 1, 1983. The implementing procedures for calculating actual or potential offsite consequences of a radiological emergency has been improved as described in procedure EP 316, and transmitted to the NRC by letter dated May 7, 1982 (S. L. Daltroff, PECO. to H. R. Denton, NRC).

(10) Item III.D.3.4 Control Room Habitability

NRC Schedule: Plant Specific

Requirement: Modify facility as identified by licensee study.

Response

The results of our control room habitability study were presented in Attachment O of the January 8, 1981 letter, (S. L. Daltroff, PECO. to D. G. Eisenhut, NRC.). The only potential hazard identified was the on-site storage of chlorine. As described in correspondence dated April 2, 1981 (J. W. Gallagher, PECO. to D. G. Eisenhut, NRC), our investigation of possible modifications concluded that the most effective means of eliminating this hazard involves the replacement of the liquified chlorine gas system with a

sodium hypochlorite biocide system. An engineering effort is underway to install the sodium hypochlorite system with the intent of meeting a completion date of January 1, 1983.