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SHIELDS L. DALTROFF
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April 15, 1982

RE: Docket Nos. 50-277
50-278

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

Subject: Response to Generic Letter No. 82-05
Post-TMI Requirements

Dear Mr. Eisenhut:

This letter transmits information requested in Generic Letter No. 82-05, D. G. Eisenhut to All Licensees of Operating Power Reactors, dated March 17, 1982, concerning implementation of selected NUREG-0737, TMI Action Plan Requirements. Information regarding NUREG-0737 items for which modifications or engineering studies have been completed is presented in Table 1. Information regarding pending NUREG-0737 items is provided in Table 2.

The proposed implementation dates represent our current estimate for completion of the work, and may be revised for reasons beyond our control; i.e., delays in equipment delivery or unforeseen mechanical problems. As identified in Table 2, we have revised the expected completion date for the wide range containment water level monitor, Item II.F.1(5) to June 30, 1982 as a result of the recent manufacturer's notification that the

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shipment date for the level transmitters has been delayed until early May 1982. The previous expected completion date was April 30, 1982 (S. L. Daltroff to D. G. Eisenhut, dated February 19, 1982). All modifications regarding NUREG-0737 items in Enclosure 1 of Generic Letter No. 82-05, for which we have made previous commitments, are expected to be completed within the next several months.

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

Sincerely,

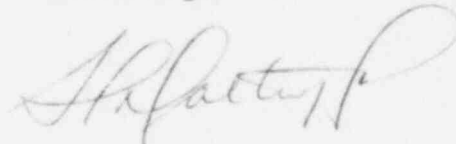
A handwritten signature in cursive script, appearing to read "S. L. Daltroff".

TABLE 1

COMPLETED NUREG 0737 ITEMS - PEACH BOTTOM STATION

Item/Title	Requirement	Nureg-0737 Schedule	Status (1)
II.A.3.1 Simulator Exams	Include simulator exams in licensing examinations	10-1-81	Simulator exam will be used starting with the first license examinations following 10-1-81 currently scheduled for May 1982.
II.B.2 Plant Scheduling	Modify Facility to provide access to vital areas under accident conditions	1-1-82	Study completed. Concluded that current design provides access to vital areas under accident conditions (1-2-80, 1-31-80, 10-15-80, 1-8-81) therefore modifications are not deemed to be necessary.
II.B.4 Training for Mitigating Core Damage	Complete training program	10-1-82	Initial training completed 11-5-80. An improved training program completed 10-2-81.
II.E.4.2 Containment Isolation Dependability - Part 5	Lower containment pressure setpoint to level compatible with normal operation	7-1-81	Study concluded that current setpoint compatible with normal operation (1-8-81). NRC concurred in a 12-15-81 letter from J. F. Stolz.
II.F.1(1) Accident Monitoring	Install noble gas effluent monitors	1-1-82	Completed 1-31-80. Letter, dated 2-8-81, from J. F. Stolz approved licensee's actions on this issue.

TABLE 1 (Cont'd)

COMPLETED NUREG-0737 ITEMS - PEACH BOTTOM STATION

Item/Title	Requirement	Nureg-0737 Schedule	Status (1)
II.F.1 (6) Accident Monitoring	Provide continuous indication of hydrogen concentration in contain- ment	1-1-82	Existing CAD hydrogen analyzer meets the NRC design criteria except for verification of environmental qualification. Qualification will be established as part of the Bulletin 79-01B program (12-23-81)
II.K.3.15 Isolation of HPCI/RCIC	Modify pipe break detection logic to prevent inadvertent isolation.	7-1-81	Completed Unit 2: 4-30-81 Unit 3: 9-2-81 (refueling outage)
II.K.3.24 Space Cooling for HPCI/RCIC	Confirm adequacy of space cooling for HPCI/RCIC	1-1-82	Study concluded that current design meets the NRC criteria (6-26-81)
II.K.3.27 Common Reference Level	Provide common reference level for vessel level instrumentation.	7-1-81	Completed September 1980 (10-2-80)

Note (1): Dates in parenthesis refer to the date of the Philadelphia Electric Company's submittal to the NRC regarding that NUREG 0737 issue.

TABLE 2

PENDING NUREG-0737 ITEMS - PEACH BOTTOM STATION

Item/Title	Requirement	Nureg-0737 Schedule	PECo. Proposed Schedule	Need for Schedule Adjustment (1)	Justification and/or Compensatory Measures
II.B.3 Post Accident Sampling	Install upgraded post-accident capability	1-1-82	Unit 2: current re- fueling outage Unit 3: 4-30-82	Time requirements associated with the installation of eleven new sample lines.	Interim sampling and counting pro- cedures implemented on 1-14-80 that improve our capability for post- accident sampling
II.E.4.2 Containment Isolation Dependabil- ity Part 7	Isolate purge and vent valves on radiation signal	7-1-81	Not Applicable	Not Applicable	PECO's 12-22-80 submittal awaiting NRC review. Submittal informed NRC that the Peach Bottom valves close on reactor building high radiation exhaust, and further clarification was requested. PECO working with BWR Owners' Group to provide a technical bases for an alternative to a drywell exhaust high radiation trip.
II.F.1 (2) Accident Monitoring	Provide capability for effluent moni- toring of iodine.	1-1-82	6/30/82	Need for further NRC clarification, and improvements in the state-of-art capabili- ty to retrieve a highly radioactive sample delayed implementation. (11-5-S1)	Interim sampling & counting pro- cedures implemented on 1-14-80 that improved our capability of analyzing iodine & particulate filters under accident conditions.

TABLE 2 (Cont'd)
PENDING NUREG-0737 ITEMS - PEACH BOTTOM STATION

Item/Title	Requirement	Nureg-0737 Schedule	PECo Proposed Schedule	Need for Schedule Adjustment (1)	Justification and/or Compensatory Measures
II.F.1.(3) Accident Monitor- ing	Install in-contain- ment radiation-level monitors	1-1-82	Unit 2: current re- fueling outage Unit 3: completed Dec. 1981	Completion of work requires a plant outage. Schedule revision pro- posed to coordinate this activity with current re- fueling outage (9-4-81)	Other parameters are available for detecting an accident situation.
II.F.1(4) Accident Monitor- ing	Provide continuous indication of contain- ment pressure	1-1-82	Unit 2: current re- fueling outage Unit 3: completed 11-17-81	Same as for item II.F.1 (3)	Two channels of contain- ment pressure indication (0-70 psig) are currently operational.
II.F.1(5) Accident Monitor- ing	Provide continuous indication of contain- ment water level	1-1-82	Unit 2: current re- fueling outage Unit 3: four weeks after delivery of level transmitters. Completion expected by 6-30-82	Time restraints associ- ated with the development of environmentally qualified equipment. Delivery of level trans- mitters delayed by vendor	Two channels of narrow range level monitors (qualified) are currently operational. Two channels of wide range level moni- tors (non-qualified) are currently operational.
II.K.3.22 RCIC Suction	Modify design of RCIC suction to provide automatic transfer to torus.	1-1-82	Unit 2: current re- fueling outage Unit 3: completed 9-23-81	Same as for item II.F.1 (5)	(1) Manual capability to transfer RCIC suction exists (procedure approved 11-13-80) (2) HPCI system available with automatic suction transfer capability.

Note (1) Dates in parenthesis refer to the date of Philadelphia Electric Company's submittal to the NRC regarding that NUREG 0737 issue.