

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

(215) 841-5001

July 19, 1982

Docket Nos. 50-277  
50-278

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

SUBJECT: ADS Valve Accumulator Nitrogen Supply  
Modification; NUREG-0737, Item II.K.3.28  
Peach Bottom Atomic Power Station

Dear Mr. Eisenhut:

This letter provides additional information concerning a modification to the Peach Bottom Units 2 and 3 Automatic Depressurization System (ADS) valve accumulator nitrogen supply system which goes beyond the requirements of NUREG 0737, Item II.F.3.28, and was described in Enclosure 2 of correspondence dated December 29, 1981 (S. L. Daltroff to D. G. Eisenhut).

In the December 29, 1981 letter, we described a plant-unique automatic trip feature that would close a solenoid isolation valve on each nitrogen supply line if the nitrogen flow becomes excessively high. The additional modification was provided to mitigate the loss of the nitrogen supply inventory in the event of a pipe break. Implementation of this supplementary modification has not been completely satisfactory since the design of the isolation valves is one-directional. Consequently, the valves do not provide a tight seal to prevent reverse flow. They are installed with the flow direction pointing outward from containment to assure positive closure of the lines if containment isolation is required. However, the one-directional

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nature of the valve will not provide isolation of inward flow in the event of a pipe break.

As a consequence, we have initiated administrative controls to limit the number of nitrogen bottles which may be attached to the supply connection so as to preclude the possibility of significant containment pressurization. Additionally, we are moving to ensure that the system functions as intended by installing replacement valves designed for two-way isolation. We have reviewed the basis for the system design specifications and have concluded that the system currently meets the requirements of NUREG 0737, Item II.K.3.28 without meeting the plant-unique feature previously described. Therefore, it is appropriate to exclude this design feature from the NUREG 0737, Item II.K.3.28 issue.

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. H. Hartup".

cc: C. J. Cowgill  
Site Inspector