10 CFR 50.90

PHILADELPHIA ELECTRIC COMPANY

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DAVID R. HELWIG
VICE PRESIDENT
NUCLEAR ENGINEERING & SERVICES

May 18, 1990

Docket No. 50-278

License No. DPR-56

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Peach Bottom Atomic Power Station, Unit 3
Additional Information Related to a
Technical Specifications Change Request

REFERENCE: Letter from G. A. Hunger, Jr. (PECo)
to U.S. Nuclear Regulatory Commission
dated April 12, 1990

Dear Sir:

In the above referenced letter, Philadelphia Electric Company (PECo) submitted Technical Specifications Change Request (TSCR) No. 89-20. This TSCR is a one-time change and involves postponing the next snubber visual inspection, due May 26, 1990, until the scheduled mid-cycle outage in the fourth quarter of 1990.

In a telephone conversation on May 14, 1990, between PECo and the NRC, the NRC staff requested additional information related to this TSCR. This information is provided as an attachment to this letter. The NRC requests are restated followed by our responses. This additional information does not change the "Information Supporting a Finding of No Significant Hazards Consideration" which was included in the original TSCR.

If you have any additional questions, please contact us.

Very truly yours,

D R Helwig

Attachment

cc: T. T. Martin, Administrator, Region I, USNRC
J. J. Lyash, USNRC Senior Resident Inspector
T. M. Gerusky, Commonwealth of Pennsylvania

A001
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COMMONWEALTH OF PENNSYLVANIA :

: ss.

COUNTY OF CHESTER :

D. R. Helwig, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company; the Applicant herein; that he has read this response related to TSCR 89-20, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

D R Helwig

Vice President

Subscribed and sworn to
before me this 18th day
of May 1990.

Catherine A. Mendez

Notary Public

NOTARIAL SEAL
CATHERINE A. MENDEZ, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires Sept. 4, 1993

NRC Question No. 1

Please describe the criteria used to determine whether a snubber is accessible or inaccessible. Of the inaccessible snubbers, how many are mechanical and how many are hydraulic?

PECo Response

Only those snubbers which are installed inside the drywell are considered to be inaccessible. The drywell is inaccessible during reactor power operation because it is inerted with nitrogen. Of the 140 inaccessible snubbers, 50 are mechanical and 90 are hydraulic.

NRC Question No. 2

Please provide the results of the licensee's evaluation of those systems or components for which large capacity snubbers or a relatively few number of snubbers are installed. Were these snubbers recently inspected?

PECo Response

We have reviewed the inaccessible snubber locations for piping and components to identify where either large capacity snubbers or a relatively few number of snubbers were installed. The purpose of this review was to identify those snubbers whose failure could have the greatest potential for impacting a component or system's operability. The system or component subject to thermal movement which has the fewest number of inaccessible snubbers is the High Pressure Coolant Injection (HPCI) system piping which has two. Both of these snubbers are relatively small capacity and were visually inspected in October 1989. These two snubbers were also functionally tested in May 1988. The largest capacity inaccessible snubbers are on the recirculation pumps. These are the three mechanical PSA-35's (rated at 50,000 pounds). One of these is installed on the A recirculation pump, and the other two are installed on the B recirculation pump. All three of the PSA-35's were visually inspected in October 1989 and functionally tested in September 1989. Each recirculation pump has five snubbers total. The remaining snubbers on the recirculation pumps are the second largest capacity inaccessible snubbers, which are the 4-inch hydraulic snubbers (rated at 27,300 pounds). These snubbers are found only on the recirculation pumps. Each of these seven snubbers was visually inspected in October 1989 and functionally tested prior to its installation following the pipe replacement modification. The third largest size of inaccessible snubbers is the hydraulic 3 1/4 inch (rated at 17,600 pounds). These snubbers are significantly smaller than the two sizes found on the recirculation pumps, and, for the purpose of this review, are not considered to be large capacity snubbers.

NRC Question No. 3

Please provide additional information on the visual inspections which occurred since January 1987, which allowed the inspection interval to be extended to a 6 month interval.

PECo Response

The chronology of visual inspections is as follows:

1/4/87	A visual inspection of 100% of the inaccessible snubbers was conducted. Three failures were identified which required the inspection interval to be shortened to 4 months ±25%.
3/7/87	A plant shutdown occurred which allowed 100% of the inaccessible snubbers to be visually inspected. Zero failures were identified. The inspection interval was not changed since there had only been three months of plant operation since the last inspection; however, the next visual inspection was rescheduled for 7/7/87 (4 months from 3/7/87).
3/31/87	Unit 3 placed in Cold Shutdown condition as a result of an NRC Order.
7/28/87	A visual inspection of 100% of the inaccessible snubbers was conducted. One failure was identified. The inspection interval was lengthened to 6 months ±25%. (Although one failure per Technical Specification 4.11.D.2 corresponds to an inspection interval of 12 months ±25%, the Technical Specifications allow the interval to be lengthened by only one step at a time.)
5/88 - 10/89	80% of the inaccessible snubbers were functionally tested after being removed from the drywell for completion of the pipe replacement modification.
10/13/89	100% of the inaccessible snubbers were visually inspected. No failures were identified. The visual inspection interval was not changed since the unit did not operate since the last visual inspection.
11/19/89	Reactor mode switch placed in startup position.