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NUCLEAR GROUP HEADQUARTERS
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NUCLEAR ENGINEERING & SERVICES DEPARTMENT

April 9, 1991

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

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

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Revision to Inservice Testing Program

REFERENCES: (1) Letter from J. W. Gallagher (PECo) to
W. R. Butler (NRC) dated June 29, 1988
(2) Letter from W. R. Butler (NRC) to
G. J. Beck (PECo) dated January 17, 1991

Dear Sir:

Enclosed for your review and approval is Relief Request
GVRR-5 and the associated valve table changes. The subject of this
Relief Request is stroke time measurement requirements for solenoid
valves. The enclosed GVRR-5 is a proposed addition to our Inservice
Testing Program which was submitted to the NRC in Reference (1) and
approved in Reference (2).

If you have any questions, please do not hesitate to
contact us.

Very truly yours,



G. J. Beck, Manager
Licensing Section
Nuclear Engineering & Services

Enclosure

cc: T. T. Martin, Administrator, Region I, USNRC
J. J. Lyash, USNRC Senior Resident Inspector, PB

9104160235 910409
PDR ADOCK 05000277
PDR

A047

RELIEF REQUEST NO. GVRR-5

VALVE(S):

SV-2-09-2671A,B,C,D,E,F,G	SV-3-09-3671A,B,C,D,E,F,G
SV-2-09-2978A,B,C,D,E,F,G	SV-3-09-3978A,B,C,D,E,F,G
SV-2-09-2980	SV-3-09-3980
SV-2-51-109	SV-3-51-109
SV-2-52-4948A,B	SV-3-52-5948A,B
SV-2-52-4949A,B	SV-3-52-5949A,B
SV-2-52-4950A,B	SV-3-52-5950A,B
SV-2-52-4951A,B	SV-3-52-5951A,B
SV-2-52-4960A,B,C,D	SV-3-52-5960A,B,C,D
SV-2-52-4961A,B,C,D	SV-3-52-5961A,B,C,D

CATEGORY:

A [All valves except SV-2-52-4948A,B, SV-2-52-4950A,B, SV-3-52-5948A,B and SV-3-52-5950A,B]

B [SV-2-52-4948A,B, SV-2-52-4950A,B, SV-3-52-5948A,B and SV-3-52-5950A,B]

TESTING REQUIREMENT(S): Measure stroke time in accordance with ASME Section XI Subsection IWV Article IWV-3413.

BASIS FOR RELIEF:

These solenoid operated valves do not have local or remote position indication, i.e. limit switches or stem position indication, to verify their position. The only means available to measure stroke time is to observe system parameters associated with valve position. Measuring stroke time using this indirect method does not provide consistent and technically meaningful results to detect valve degradation. Furthermore, solenoid valves in general, tend not to exhibit gradual change or increase in stroke time, but most commonly fail to operate at all.

Verifying that the valves exercise properly, by observing system parameters associated with valve position, provides adequate assurance of valve operational readiness.

ALTERNATE TESTING:

These valves will be exercise tested quarterly to ensure operability. Stroke time will not be measured. The valves will be verified fully open and closed based on available instrumentation and appropriate system parameters.

1ST TABLE - VALVES
PEACH BOTTOM ATOMIC POWER STATION - UNIT 2 & COMMON

PAGE NO: 1
DATE: 02/20/91

SYSTEM: 05 CONTAINMENT ATMOSPHERIC CONTROL

VALVE NUMBER	P&ID	COORD	VALVE CAT	ACT/ PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITION			APP. J TYPE C	TEST FREQUENCY (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
SV-2-09-2671A	M-367 (SHT 1)	E-4	A	A	.5	GT	SC	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-218B
SV-2-09-2671B	M-367 (SHT 1)	E-4	A	A	.5	GT	SO	O	C	C		ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-203
SV-2-09-2671C	M-367 (SHT 1)	E-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51C
SV-2-09-2671D	M-367 (SHT 1)	E-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51B
SV-2-09-2671E	M-367 (SHT 1)	E-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51A
SV-2-09-2671F	M-367 (SHT 1)	E-5	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-219
SV-2-09-2671G	M-367 (SHT 1)	E-5	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-26
SV-2-09-2978A	M-367 (SHT 1)	D-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-218B
SV-2-09-2978B	M-367 (SHT 1)	D-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-203
SV-2-09-2978C	M-367 (SHT 1)	D-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51C
SV-2-09-2978D	M-367 (SHT 1)	D-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51B
SV-2-09-2978E	M-367 (SHT 1)	D-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51A

1ST TABLE - VALVES
PEACH BOTTOM ATOMIC POWER STATION - UNIT 2 & COMMON

PAGE NO: 2

DATE: 02/20/91

SYSTEM: 09 CONTAINMENT ATMOSPHERIC CONTROL

VALVE NUMBER	P&ID	COORD	VALVE CAT.	ACT/ PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITION			APP. J TYPE C	TEST FREQUENCY (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
SV-2-09-2978F	M-367 (SHT 1)	D-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-219
SV-2-09-2978G	M-367 (SHT 1)	D-3	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-26
SV-2-09-2980	M-367 (SHT 1)	B-5	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51D

1ST TABLE - VALVES
PEACH BOTTOM ATOMIC POWER STATION - UNIT 2 & COMMON

PAGE NO: 3
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SYSTEM: 51 INSTRUMENT NITROGEN SYSTEM

VALVE NUMBER	P&ID	COORD	VALVE CAT.	ACT/ PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITION			APP. J TYPE C	TEST FREQUENCY (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
SV-2-51-109	M-376 (SHT 1)	E-6	A	A	.375	GT	SO	OC	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PART OF TIP SYSTEM, PENT. N-35

1ST TABLE - VALVES
PEACH BOTTOM ATOMIC POWER STATION - UNIT 2 & COMMON

PAGE NO: 4
DATE: 02/20/91

SYSTEM: S2 CONTAINMENT ATMOSPHERIC DILUTION

VALVE NUMBER	P&ID	COORD	VALVE CAT.	ACT/ PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITION			APP. J TYPE C	TEST FREQUENCY (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
SV-2-52-4948A	M-372 (SHT 1)	G-8	B	A	1	GL	SO	C	O	C	N	ET-Q, FS-Q(C), PI-T	GVRR-5	
SV-2-52-4948B	M-372 (SHT 1)	E-5	B	A	1	GL	SO	C	O	C	N	ET-Q, FS-Q(C), PI-T	GVRR-5	
SV-2-52-4949A	M-372 (SHT 1)	G-8	A	A	1	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-39B
SV-2-52-4949B	M-372 (SHT 1)	E-5	A	A	1	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-39B
SV-2-52-4950A	M-372 (SHT 1)	E-8	B	A	1	GT	SO	C	O	C	N	ET-Q, FS-Q(C), PI-T	GVRR-5	
SV-2-52-4950B	M-372 (SHT 1)	E-5	B	A	1	GT	SO	C	O	C	N	ET-Q, FS-Q(C), PI-T	GVRR-5	
SV-2-52-4951A	M-372 (SHT 1)	E-8	A	A	1	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-211B
SV-2-52-4951B	M-372 (SHT 1)	E-5	A	A	1	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-211A
SV-2-52-4960A	M-372 (SHT 1)	C-7	A	A	.5	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-219
SV-2-52-4960B	M-372 (SHT 1)	C-7	A	A	.5	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-26
SV-2-52-4960C	M-372 (SHT 1)	B-7	A	A	.5	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-5.C
SV-2-52-4960D	M-372 (SHT 1)	A-7	A	A	.5	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-203

1ST TABLE - VALVES
PEACH BOTTOM ATOMIC POWER STATION - UNIT 2 & COMMON

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SYSTEM: 52 CONTAINMENT ATMOSPHERIC DILUTION

VALVE NUMBER	P&ID	COORD	VALVE CAT.	ACT/ PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITION			APP. J TYPE C	TEST FREQUENCY (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
SV-2-52-4961A	M-372 (SHT 1)	C-7	A	A	.5	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-219
SV-2-52-4961B	M-372 (SHT 1)	C-7	A	A	.5	GT	SO	C	OC		Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-26
SV-2-52-4961C	M-372 (SHT 1)	B-7	A	A	.5	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51C
SV-2-52-4961D	M-372 (SHT 1)	B-7	A	A	.5	GT	SO	C	OC		Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-203

1ST TABLE - VALVES
PEACH BOTTOM ATOMIC POWER STATION - UNIT 3

PAGE NO: 6
DATE: 02/20/91

SYSTEM: 09 CONTAINMENT ATMOSPHERIC CONTROL

VALVE NUMBER	P&ID	COORD	VALVE CAT.	ACT/ PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITION			APP. J TYPE C	TEST FREQUENCY (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
SV-3-09-3671A	M-367 (SHT 2)	E-4	A	A	.5	GT	SO	O	L	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-215a
SV-3-09-3671B	M-367 (SHT 2)	E-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-203
SV-3-09-3671C	M-367 (SHT 2)	E-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51C
SV-3-09-3671D	M-367 (SHT 2)	E-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51B
SV-3-09-3671E	M-367 (SHT 2)	E-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51A
SV-3-09-3671F	M-367 (SHT 2)	E-5	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-219
SV-3-09-3671G	M-367 (SHT 2)	E-5	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-26
SV-3-09-3978A	M-367 (SHT 2)	D-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-218B
SV-3-09-3978B	M-367 (SHT 2)	D-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-203
SV-3-09-3978C	M-367 (SHT 2)	D-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51C
SV-3-09-3978D	M-367 (SHT 2)	D-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51B
SV-3-09-3978E	M-367 (SHT 2)	D-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51A

1ST TABLE - VALVES
PEACH BOTTOM ATOMIC POWER STATION - UNIT 3

PAGE NO: 7
DATE: 02/20/91

SYSTEM: 09 CONTAINMENT ATMOSPHERIC CONTROL

VALVE NUMBER	P&ID	COORD	VALVE CAT	ACT/ PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITION			APP. J TYPE C	TEST FREQUENCY (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
SV-3-09-3978F	M-367 (SHT 2)	D-4	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-219
SV-3-09-3978G	M-367 (SHT 2)	D-3	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-26
SV-3-09-3980	M-367 (SHT 2)	B-5	A	A	.5	GT	SO	O	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-510

1ST TABLE - VALVES
PEACH BOTTOM ATOMIC POWER STATION - UNIT 3

PAGE NO: 8
DATE: 02/26/91

SYSTEM: 51 INSTRUMENT NITROGEN SYSTEM

VALVE NUMBER	P&ID	COORD	VALVE CAT.	ACT/ PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITION			APP. J TYPE C	TEST FREQUENCY (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
SV-3-51-109	M-376 (SHT 2)	E-6	A	A	.375	GT	SO	OC	C	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PART OF T ¹ SYSTEM PENT. H-35

1ST TABLE - VALVES
PEACH BOTTOM ATOMIC POWER STATION - UNIT 3

PAGE NO: 9
DATE: 02/20/91

SYSTEM: 52 CONTAINMENT ATMOSPHERIC DILUTION

VALVE NUMBER	P&ID	COOR.	VALVE CAT.	ACT/ PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITION			APP. J TYPE C	TEST FREQUENCY (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
SV-3-52-5948A	M-372 (SHT 2)	E-5	B	A	1	GT	SO	C	OC	C	N	ET-Q, FS-Q(C), PI-T	GVRR-5	
SV-3-52-5948B	M-372 (SHT 2)	G-5	B	A	1	GT	SO	C	OC	C	N	ET-Q, FS-Q(C), PI-T	GVRR-5	
SV-3-52-5949A	M-372 (SHT 2)	G-8	A	A	1	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-39B
SV-3-52-5949B	M-372 (SHT 2)	E-5	A	A	1	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-39B
SV-3-52-5950A	M-372 (SHT 2)	E-5	B	A	1	GT	SO	C	OC	C	N	ET-Q, FS-Q(C), PI-T	GVRR-5	
SV-3-52-5950B	M-372 (SHT 2)	E-8	B	A	1	GT	SO	C	OC	C	N	ET-Q, FS-Q(C), PI-T	GVRR-5	
SV-3-52-5951A	M-372 (SHT 2)	E-8	A	A	1	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-211B
SV-3-52-5951B	M-372 (SHT 2)	E-5	A	A	1	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-211A
SV-3-52-5960A	M-372 (SHT 2)	C-7	A	A	.5	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-219
SV-3-52-5960B	M-372 (SHT 2)	C-7	A	A	.5	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-26
SV-3-52-5960C	M-372 (SHT 2)	B-7	A	A	.5	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51C
SV-3-52-5960D	M-372 (SHT 2)	A-7	A	A	.5	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-203

1ST TABLE - VALVES
PEACH BOTTOM ATOMIC POWER STATION - UNIT 3

PAGE NO: 10
DATE: 02/26/91

SYSTEM: 52 CONTAINMENT ATMOSPHERIC DILUTION

VALVE NUMBER	P&ID	COORD	VALVE CAT.	ACT/ PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITION			APP. J TYPE C	TEST FREQUENCY (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
SV-3-52-5961A	M-372 (SHT 2)	C-7	A	A	.5	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-219
SV-3-52-5961B	M-372 (SHT 2)	C-7	A	A	.5	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-26
SV-3-52-5961C	M-372 (SHT 2)	B-7	A	A	.5	GT	CO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-51C
SV-3-52-5961D	M-372 (SHT 2)	B-7	A	A	.5	GT	SO	C	OC	C	Y	ET-Q, FS-Q(C), LJ-T, PI-T	GVRR-1, GVRR-5	PENT. N-203