

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

(215) 841-5001

May 20, 1983

Docket Nos: 50-277
50-278

Mr. John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Stolz:

Your letter of March 22, 1983 (J.F. Stolz, NRC to E.G. Bauer, PECO), concerning the clarification of Qualification Safety Evaluation Report, requested Philadelphia Electric Company, by May 20, 1983, to identify electric equipment important to safety that is already qualified, submit a schedule for qualification or replacement of the remaining electrical equipment per 10CFR50.49 Paragraph (g), describe PECO's methods used to identify the equipment covered by 10CFR50.49 (b)(2), and establish any qualification programs not previously described for such equipment. This letter and the enclosed 'Attachment 1' responds to these items as follows:

REQUEST

"Paragraph (g) [of 10CFR50.49] of the rule requires that by May 20, 1983, licensees identify electrical equipment important to safety, within the scope of the rule, that is already qualified and submit a schedule for the qualification or replacement of the remaining electrical equipment within the scope of the rule in accordance with the qualification deadline specified in Paragraph (g). The submittal required by the rule should specifically indicate whether your previous submittals comply with Paragraphs (a) and (b) of 10CFR50.49. In addition, you are requested to describe in your submittal, the methods used to identify the equipment covered by 10CFR50.49(b)(2), and to establish any qualification programs not previously described for such equipment."

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RESPONSE:

Philadelphia Electric Company's submittals of January 30, 1981, September 3, 1981, and March 1, 1982, in response to IE Bulletin 79-01B, Supplement 3, identified electrical equipment important to safety which is already qualified and the September 3, 1981 and March 1, 1982 submittals include a schedule for the remaining equipment for which a modification is required to establish qualification.

PECO has concluded that the equipment contained in Category IIA of the Safety Evaluation Report (SER) dated December 20, 1982, (equipment qualification not established) is environmentally qualified for its intended safety function. The Philadelphia Electric Company's letter of February 4, 1983 (S.L. Daltroff, PECO to J.F. Stolz, NRC) stated that equipment listed in Category IIA of the Technical Evaluation Report (TER) dated August 3, 1982, is environmentally qualified and PECO has requested a meeting with the staff to present the bases for this conclusion. Based on this analysis, no additional modifications are required to meet the requirements of 10CFR50.49 Paragraph (g). Attachment 1, EQ Modification Schedule dated May 20, 1983 up-dates the previous submittals.

In 'Attachment 1', the column headed 'Equipment Identification' identifies the equipment requiring modification, and the column headed 'EQ Modification Status' presents dates for completing the modifications.

PECO's previously submitted letters of January 1, 1981, September 3, 1981, and March 1, 1982, comply with Paragraphs (a) and (b) of 10CFR50.49. The lists of equipment included in these submittals are based on a review of the PBAPS Q-List, Electrical Schematic Drawings, Piping and Instrument Diagrams (P&ID's) and the FSAR. The FSAR is the basis for determining the systems required to mitigate the effects of the postulated LOCA and HELB accidents. The Q-List, Electrical Schematic Drawings and Piping and Instrument Diagrams (P&ID) were reviewed concurrently to determine the role of individual electrical components in supporting the operation of systems identified from the FSAR. If it was determined that (1) the failure of the component could prevent the system from performing its safety function and (2) the component was located in a potentially harsh environment, the component was included in 79-01B Equipment List.

J. F. Stoltz, Chief, NRC
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In addition, the equipment installed in response to the TMI action items has been included in the 79-01B Equipment List. The Emergency Procedures have been reviewed and instrumentation which is relied upon for operator action and is located in a potentially harsh environment has also been included.

Based on the PECO review, modifications installed due to TMI lessons learned and current emergency procedures, it is concluded that PBAPS Units 2 and 3 are in compliance with the requirements contained in Paragraph (b)(2) of 10CFR50.49.

Should you require further information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "J. F. Stoltz", written in a cursive style.

Attachment

cc: R.A. Blough
Site Inspector

May 20, 1983

ATTACHMENT 1EQ MODIFICATION SCHEDULE

<u>PBAPS UNIT</u>	<u>EQUIPMENT IDENTIFICATION NUMBER</u>	<u>EQ MODIFICATION STATUS</u>
Common	OAV20,OBV20,OCV20	These motors will be replaced. Completion due by 10/83.
2 & 3	MO-14-11A,11B,12A,12B	The brakes on these valve actuators will
2 & 3	MO-10-25A,B	be replaced;
2 & 3	MO-23-19	Unit 2 - Completion due by end of 10/83
2 & 3	MO-14-26A,B,MO-10-13A,B,C,D	Refueling Outage
2 & 3	MO-23-20,MO-10-34A,B,MO-10-154A,B	Unit 3 - Completion due by end of 10/84
		Refueling Outage
2	MO-23-25	The drive motor will be replaced. Completion due by end of 10/83 Refueling Outage.
2 & 3	SV2671A,B,C,D,E,F,G	These solenoid valves are being tested
2 & 3	SV2678A,B,C,D,E,F,G	by NTS, completion due by 6/84.
2 & 3	SV2980,SV-4777,78,79, 80,82,83,84,85, 92A,B,C,D, SV-4962A,B,C,D, SV-4964A,B,C,D	
2	LS-23-91A,B	These level switches will be replaced. Completion due by end of 10/83 Refueling Outage.
2 & 3	N3692,N3693,N3772,N3773	This equipment is being tested to
2 & 3	N3783,N3784,N3884,N3885	resolve the EQ documentation
2 & 3	N3994,N3995	deficiency. Test completion due 6/83.
2 & 3	PS-14-044A,B,C,D,PS-10-120A, B,C,D,E,F,G,H	
Common	DPS-00014,00015	This equipment is being tested to
2 & 3	DPS-20400-03,04,05,06,07,	resolve the EQ documentation deficiency.
2 & 3	08,09,10,11,12,13,14,15,	Test completion due 6/83.
2 & 3	16,17,18,19,20	
Common	OAE65,OBE65	Complete
2 & 3	EPTB-003	
2 & 3	PS-10-121A,B,C,D	
2 & 3	2AP35,2BP35,2CP35,2DP35	Complete
2 & 3	2OB10,11,12,13	Complete

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EQ MODIFICATION SCHEDULE (CONT)

<u>PBAPS UNIT</u>	<u>EQUIPMENT IDENTIFICATION NUMBER</u>	<u>EQ MODIFICATION STATUS</u>
2 2 & 3 2 & 3	2OD11A N210025A,B,20B36,37,38 39,20D11	An analysis will be performed; a Purchase Order will be issued 6/83.
2 & 3 2 & 3 2 & 3 2 & 3 2 & 3	MPL23-1,2 FT-23-82 PS-23-68A,B,C,D PS-23-84-1 PS-23-97A,B	These items have been exempted from a qualification up-grade; see response to SER Item 4.2. 9/3/81 submittal.
2 & 3	PT-4952,4953 PT-5952,5953	Review of the plant-specific emergency procedures has shown that the parameter monitored by these pressure transmitters (ie, suppression pool pressure) is not considered a Type A variable as defined by NRC Regulatory Guide 1.97, revision 2. Therefore, these transmitters do not need to be replaced to meet the environmental qualification requirements of 1E Bulletin 79-01B.
2 & 3	TE-2501-36A,B TE-3501-36A,B	Unit 2 - Completion due by end of 10/83 Refueling Outage. Unit 3 - Completion due by end of 10/84 Refueling Outage.
2 & 3	LT-02-3-72C,D(old LT No.) LT-02-3-110C,D (new LT No.) LT-02-3-73A,B (old LT No.) LT-02-3-111A,B, (new LT No.)	Unit 2 - Complete Unit 3 - Completion due by end of 2/83 Refueling outage. The old LT will remain in service for short term operation post accident, the new LT is for long term emergency procedure post accident operation.
2 & 3	2-PT-6-105 3-PT-6-105	Unit 2 - Completion due by end of 10/83 Refueling outage. Unit 3 - Completion due by end of 10/84 Refueling outage.
2 & 3	TE-2442A,B TE-3442A,B	Unit 2 - Completion due by end of 10/83 Refueling outage. Unit 3 - Completion due by end of 2/83 Refueling outage.
2 & 3	POAM-2-70A,B,POAM-2- 71A,B,C,D,E,F,G,H,J,K,L	Complete

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EQ MODIFICATION SCHEDULE (CONT)

<u>PBAPS UNIT</u>	<u>EQUIPMENT IDENTIFICATION NUMBER</u>	<u>EQ MODIFICATION STATUS</u>
2 & 3	POT-2-71A ,B,C,D,E,F,G,H, J,K,L,M	Unit 2 - Completion due by end of 10/83 Refueling outage. Unit 3 - Complete by end of 2/83 Refueling outage.
2 & 3	RE-8103A,B,C,D RE-9103A,B,C,D	Complete
2 & 3	PT-8102A,B,C,D PT-9102A,B,C,D	Complete
2 & 3	SV-8101 SV-9101	Complete
2 & 3	SV-8100 SV-9100	Complete