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July 15, 1983

Docket Nos. 50-277
50-278

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

Subject: NUREG-0737, Item II.K.3.18, Automatic
Depressurization System (ADS) Actuation

Dear Mr. Stolz:

Your letter of June 3, 1983, (J. F. Stolz to E. G. Bauer, Jr., PECO) forwarded the NRC Safety Evaluation of seven alternatives proposed by the BWR Owners Group to modify the present Automatic Depressurization System (ADS) logic per NUREG-0737, Item II.K.3.18. The options acceptable to the NRC were identified as: (1) elimination of the high drywell pressure permissive and addition of a manual inhibit switch, and (2) bypass of the high drywell pressure permissive after a sustained low water level and addition of a manual inhibit switch.

Philadelphia Electric Company has evaluated these options and proposes to modify the ADS logic on Peach Bottom Units 2 and 3 by addition of a timer that bypasses the high drywell pressure permissive if the reactor water level is low for a sustained period and addition of a manual inhibit switch, i.e. option (2).

Prior to submission of the appropriate Technical Specifications regarding this modification, an analysis and justification of the bypass timer setting must be performed for Peach Bottom Units 2 and 3 by the NSSS supplier. To allow

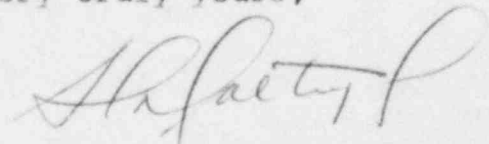
sufficient time to perform this analysis, and perform detailed engineering of the modification, we propose to submit the appropriate amendment to the Technical Specifications for prior NRC approval in compliance with 10 CFR 50.59(a)(1) by June 30, 1984.

Further, the proposed submittal date will provide sufficient time for the NRC staff to complete and issue a Model Technical Specification (MTS) addressing the NUREG-0737, Item II.K.3.18 requirement. A draft MTS addressing selected NUREG-0737 items, including item II.K.3.18, was transmitted to the BWR Owners' Group for comment. It has been the practice of the NRC staff to require a license amendment application on NUREG-0737 items only after a MTS addressing the specific requirement has been issued for the licensees consideration. This practice has been effective in developing technical specification changes that reflect NRC licensing standards.

We propose to implement the modification during the refueling outage for each unit following receipt of approval of the modification and an appropriate amendment to the operating licenses.

We trust this information is satisfactory; but should you have any questions, please do not hesitate to contact us.

Very truly yours,



cc: A. R. Blough
Site Inspector