

PHILADELPHIA ELECTRIC COMPANY

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V. S. BOYER
SR. VICE PRESIDENT
NUCLEAR POWER

(215) 841-4500

February 10, 1984
Docket Nos. 50-277
50-278

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

SUBJECT: Peach Bottom Atomic Power Station
Penetration Seal Upgrade Program

- REFERENCES:
- 1) Letter from J. W. Gallagher to D. G. Eisenhut dated October 14, 1981
 - 2) Letter from V. S. Boyer to D. G. Eisenhut, dated September 16, 1983
 - 3) Letter from V. S. Boyer to D. G. Eisenhut, dated December 2, 1983

Dear Mr. Eisenhut,

Philadelphia Electric Company, in Reference 1, proposed to upgrade the electrical and mechanical penetration seals in those barriers separating redundant safe shutdown components to meet the design criteria identified in 10CFR50, Appendix R, Sections IIIG and IIIM. We requested, in a second letter, Reference 3 pursuant to 10CFR50.12, an extension in the date for completion of the rerouting of safe shutdown cabling.

This letter will provide: (1) the current status and projected completion date of the continuing penetration seal program and; (2) the proposed schedule extension for specific cable rerouting.

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I Penetration Seal Upgrade Program

A. Status

As of February 5, 1984, 4160 penetration seals have been upgraded. It is estimated that a total of 6300 electrical and mechanical seals will require upgrading. The survey of safe shutdown barriers is 95% complete. Seals have been installed at an average rate of (25) per day, projecting a completion total of 4600 by March 1, 1984. The following table lists a more detailed breakdown of the completed installation work per unit:

<u>Location</u>	<u>Completed Seals</u> <u>(2/5/84)</u>
Unit 2	1272
Unit 3	2136
Common	<u>752</u>
Total	4160

Work has been concentrated in Unit 3 and common in anticipation of the Unit 2 refueling outage in the Spring of 1984. Analysis has shown that only 340 seals are exclusively associated with Unit 2. These seals will be upgraded last. An additional 225 seals require a Unit 2 outage due to access restrictions resulting from high radiation or high voltage. The balance of the remaining work is scattered throughout the plant in safe shutdown barriers. Completed areas to date include all emergency switchgear and battery rooms.

B. The following discussion describes circumstances which contributed toward delays in program completion:

- 1) In reference 2, we reported that the Philadelphia Local of Asbestos Workers was on strike, limiting the availability of workers from surrounding union halls. The work force during the strike fluctuated from (47) in late May 1983 to (74) during the middle of September, 1983. When a settlement was reached in September, 1983, (120) asbestos workers were employed on two shifts; the maximum number of craft which could be supported by station personnel. A significant loss in seal installation production occurred during these four months that the strike was in progress.

As part of our efforts to mitigate this production problem and as reported in reference 2, an extensive testing program was undertaken to qualify existing sealing materials. Results of these tests and our implementation program have been submitted.

- 2) During this same time period, a large portion of our work force was diverted from the scheduled seal work toward correcting initial construction deficiencies found in several emergency switchgear and battery rooms. Corrective action and resulting surveys in other areas severely restricted penetration seal installation production during a period when additional manpower was not available. These immediate corrective actions are well documented and the subject of an Enforcement Conference held at the NRC Region I Office in King of Prussia on August 11, 1983.
- 3) Our Alternative Shutdown Proposal was submitted on September 16, 1983 for NRC review. Approval was received on January 26, 1984. Reference 1 stated "Completion of the upgrade effort will be consistent with the schedule for implementing the alternative shutdown modifications (March 1, 1984)". Although this SER approval has not directly affected the upgrade program, it could be considered a factor in completion of our survey of safe shutdown barriers which identified all electrical and mechanical seals requiring upgrade.

We hereby request, pursuant to 10CFR50.12, an exemption from the March 1, 1984 completion date as stated below:

- a) For all No. 3 Unit penetration seals, an extension to June 1, 1984;
- b) For all No. 2 Unit penetration seals, an extension to June 1, 1984 or to the end of the Unit 2 Refueling Outage, whichever is latest.

II Cable Re-Routing Programs

Under No. 3 Unit, attachment E to reference 3, we committed to having ten cables rerouted by 3/15/84 (with any necessary encapsulation complete also). Rerouting these cables will require approximately (5) days of system inoperability

(blocking) for one cable (HPCI) and (9) days of system inoperability (blocking) for the remaining 9 cables (Core Spray). PECO feels that it would not be prudent to block either of these ECCS systems while the unit is at power. Therefore, we hereby request, pursuant to 10CFR50.12, an exemption to our present completion schedule such that the above reroutes will not be required to be completed until the next Unit 3 forced outage commencing after 2/29/84 of sufficient duration to do this work in series (due to licensing requirements the HPCI and Core Spray Systems cannot be blocked simultaneously).

We are confident that this letter documents the continued efforts being made at Peach Bottom to meet our commitments, and sufficiently states the need for the requested exemptions to the previously referenced schedules.

Should you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

Jim Gallagher
for
V S Boyer

GMM/cam/gmm71

Copy to: A. R. Blough, Site Inspector
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