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December 27, 1983

Docket Nos. 50-277

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

SUBJECT: Inservice Inspection (ISI) Program
Peach Bottom Atomic Power Station

Reference: Letter J. F. Stolz, USNRC, to E. G. Bauer, Jr.
Philadelphia Electric Company, dated May 2, 1983

Dear Mr. Stolz:

The reference letter forwarded the Technical Evaluation Report (TER), prepared by Science Applications, Inc. and the NRC Safety Evaluation of the Peach Bottom Units 2 and 3 ISI program submitted August 4, 1977, and as revised January 23, 1978, September 20, 1978, November 22, 1978, April 5, 1982 and June 11, 1982. The TER provided to the NRC a review of the Philadelphia Electric Company requests for relief from the 1974 Edition (including 1975 Addenda) of Section XI of the ASME Code. In the subsequent Safety Evaluation, the NRC has determined that there are cases in which relief can be granted as requested, can be granted with provisions, or cannot be granted.

Section 50.55a(g) of 10CFR Part 50 requires that our program be revised at 120-month intervals. The start of the next 120-month interval for Peach Bottom Unit 2 is July 6, 1984. The reference letter specifies that until that time we should follow the ISI program specified by our letter dated August 4, 1977, for Unit 2, modified as described within the attached Safety Evaluation.

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We are requesting that the NRC consider granting schedule relief, under the current 10-year ISI program, which expires on July 5, 1984, for Unit 2 to the PECO relief request recently denied regarding the testing of ECSS systems under Article IWC-1220(c).

In accordance with 10CFR50.55a(g), the current Peach Bottom ISI and testing program is in the process of being revised (to reflect 1980 Section XI Code requirements) for the next 120-month interval. Incorporation of the denied relief request in the current program would impose a significantly expanded work scope which, along with development of the new program, would be impractical to implement in the time available between the denial and the beginning of the next 120-month interval program which becomes effective in July, 1984, for Unit 2.

We are proposing a schedule to complete inspections on Class II ECCS components and piping previously exempted under Article IWC-1220(c) of Section XI of the ASME Code.

The reasons for the exemption request and proposed schedule for examination of the components are set forth more fully below.

Class II Emergency Core Cooling System (ECCS) Components and Piping Previously Exempt Under IWC-1220(c)

There is not sufficient time remaining in the current ISI interval to complete the inspection of the subject components and piping, particularly portions of the RHR, Core Spray, and HPCI systems. The following work must be performed prior to the actual required examinations.

1. An examination plan must be developed which includes the physical identification of all pipe welds and components.
2. Erection of a significant amount of scaffolding.
3. Upon gaining access to the piping, the weld crowns require significant rework. Presently, the weld configurations are not conducive to Ultrasonic Testing.

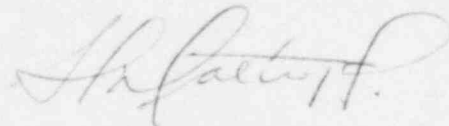
Due to the date of receipt of the reference NRC letter in the current interval and the number of interval inspection outages (5) already completed during the current 120-month ISI interval, Philadelphia Electric Company proposes to examine a minimum 1/6 of the total number of subject components and pipe welds required

for examination during the current interval. This is based on six inspection periods per 120-month ISI interval. This plan would carry through into the next 120-month ISI interval to ensure that all ECCS component inspections are completed during that interval.

Accordingly, we hereby request, pursuant to Section 50.12 of the Commission's regulations, an exemption from performing the aforementioned Inservice Inspection provisions of 10CFR50.55a(g) during the current 120-month interval and request prompt NRC concurrence in order that this exemption may be incorporated during the remainder of the current Unit 2 ISI interval.

Should you have any questions on the above, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. F. Stolz", is written over the typed name.

cc: A. R. Blough, Site Inspector