

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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April 16, 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
Emergency Service Water (ESW) Technical Specifications

- REFERENCES:
- 1) Request For Additional Information (RAI)
Technical Change Request 87-06
dated August 23, 1990
 - 2) October 26, 1990, G. A. Hunger to NRC,
Response to a Request for Additional
Information (RAI)

Dear Mr. Suh:

In January of 1988, Philadelphia Electric Company filed a Technical Specification Change Request (TSCR 87-06) to address concerns the NRC raised in Inspection Report 50-277/86-25 and 50-278/86-25, Item number 5.2.4. The NRC's concerns focused on Technical Specification 3.9.C.3, which details the criteria for considering the ESW pump and the ECW pump as equivalent equipment. Subsequently, during the Safety System Functional Inspection (SSFI, Inspection Report Nos. 90-200, 90-200), there was a question as to how well the equivalency could be supported technically. The Reference Letter 1 forwarded the NRC's Request for Additional Information on TSCR 87-06. In the Reference Letter 2, Philadelphia Electric Company stated that the Emergency Cooling Water (ECW) pump in combination with an ESW Booster pump and an ECW Cooling Tower Tower Fan could not be proven conclusively to be equivalent to an ESW pump. PECO, in the Reference Letter 2, withdrew that Technical Specification Change Request (TSCR) 87-06 and committed to provide a new amendment request by February 28, 1991. We were unable to satisfy this date because of difficulties in obtaining appropriate

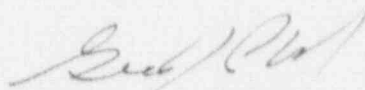
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station and corporate technical and management reviews. During this review, management requested an additional evaluation of all possible solutions to the ESW ECW equivalency concern.

This evaluation will determine the proposed allowable out of service times for the ESW pumps. Our goal is that this evaluation be responsive to the issues raised in the SSFI and in Inspection Report 86-25. Until this evaluation is complete and the eventual solution implemented, PECO commits to the conditions of the present PORC Position Number 33. This PORC position recognizes that the ECW and the ESW pumps could not be proven to be equivalent and therefore establishes out-of-service time for an ESW pump of seven days for one pump and 6 hours for two ESW pumps; no credit is taken for the ECW pump. The results of the evaluation along with an appropriate Technical Specification Change Request will be submitted to the NRC by August 1, 1991.

We are therefore requesting a further delay in submitting this new Technical Specification Change Request until August 1, 1991. We regret any inconvenience this delay may have caused you. Please feel free to contact Jim Basilio or me if you have any questions.

Very truly yours,



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

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