

# PHILADELPHIA ELECTRIC COMPANY

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April 2, 1984

Docket Nos. 50-277  
50-278

Mr. John F. Stolz, Chief  
Operating Reactors Branch No. 4  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Peach Bottom Atomic Power Station  
License Amendment Application  
Dated August 6, 1981

Dear Mr. Stolz:

This letter addresses the current status, and provides additional information, in regards to a Peach Bottom Amendment Application dated August 6, 1981, involving several requested changes. The information is provided in response to an informal request by telephone from the Peach Bottom Project Manager.

1. The revisions on pages 13, 59, 208, and 208a of the Application regarding operability requirements for radiation monitors should not be considered. These revisions have been superseded by the efforts to develop an Appendix I Technical Specification. Correspondence dated August 15, 1982, (S. L. Daltroff, PECO, to H. R. Denton, NRC) formally withdrew the revisions proposed on pages 59, 208, and 208a.
2. The revisions on pages 234h, 234i, 234m, 234o, 234p, 234q, 234r, and 234s, regarding the Snubber Table, have been combined with other Amendment Applications and submitted by correspondence dated September 14, 1983, (J. S. Kemper, PECO, to G. E. Gears, NRC). It is our understanding that these changes in the Snubber Table are being reviewed by Region I.
3. The proposed revisions on pages 51 and 128 of the application are minor in nature and it is our request that they remain for consideration.

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4. The NRC staff requested additional information to explain and justify the proposed revision on page 171 regarding position verification of the drywell - suppression chamber vacuum breakers. The Technical Specifications permits one drywell suppression chamber vacuum breaker to be in the non-fully closed position so long as it is determined to be not more than 3 degrees open as indicated by the position lights. The proposed change would recognize the current practice of performing a verification test in the event that position lights do not confirm a vacuum breaker to be in the fully closed position.

Vacuum in the drywell is relieved by twelve 18 inch valves between the drywell and the suppression chamber. These valves, manufactured by Vapor Corporation, are self-activating vacuum breaker similar to simple check valves (flapper type valve disc pivoted at the top). The position indicating switches are activated by a mechanical mechanism attached to the valve disc. Due to the relative inaccuracies in the position indicating mechanism, both open and close position lights will occasionally illuminate while the plant is at power, indicating that the vacuum breaker may not be in the fully closed position. Under these circumstances, a drywell to suppression chamber bypass area test is performed in accordance with the surveillance test procedure used to verify Technical Specification 4.7.A.4.d (no drywell to suppression chamber bypass larger than or equivalent to one inch diameter hole). This test is performed by a pressure differential between the suppression chamber and the drywell (suppression chamber at a slight vacuum and the drywell at a slight positive pressure). The rate of rise in suppression chamber pressure is used to calculate the size of the bypass opening. A calculated bypass hole of less than one inch diameter confirms the fully seated condition of all drywell to suppression chamber vacuum breakers.

In order to clarify the intent of the proposed testing provision, we propose that the additional provision shown on page 171 (3.7.A.4.b) in the August 6, 1981 Amendment Application be deleted, and substituted with the following two sentences:

"In the event the position lights do not confirm a fully closed position, a leak test of the drywell to suppression chamber integrity may be performed. Compliance with the acceptance criteria of specification 4.7.A.4.d confirms the fully closed condition of all vacuum breakers."

Summarizing, only the changes requested on pages 51, 128, and 171 should be considered under the August 6, 1981 Amendment Application. The changes proposed on pages 13, 59, 208, and 208a, are hereby withdrawn, and the changes requested for the Snubber Table should be combined with other amendment applications as described in correspondence dated September 14, 1983.

Should you have any questions regarding this matter, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "A. R. Blough", written in a cursive style.

cc: A. R. Blough, Site Inspector