

PHILADELPHIA ELECTRIC COMPANY

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PHILADELPHIA, PA. 19101

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

(215) 841-5001

June 29, 1984

Docket Nos. 50-277
50-278

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

- REFERENCES:
1. Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events", July 8, 1983.
 2. Letter, J. F. Stolz, USNRC to E. G. Bauer, Jr., PECO, "Clarification of Required Actions Based on Generic Implications of Salem ATWS Events", October 21, 1983.
 3. Letter, S. L. Daltroff, PECO, to D. G. Eisenhut, USNRC, Response to Generic Letter 83-28, November 4, 1983
 4. Letter, S. L. Daltroff, PECO, to D. G. Eisenhut, USNRC, Follow up Response to Generic Letter 83-28, April 23, 1984

Dear Mr. Eisenhut:

This letter is a follow-up to the Reference 4 letter and addresses the current status of Philadelphia Electric Company's program to address Items 3.1.2 and 3.2.2 in Generic Letter 83-28 "Required Actions Based on Generic Implications of Salem ATWS Events," July 8, 1983. The required actions regarding post maintenance testing of reactor protection system components and all other safety related equipment, respectively is as restated below along with our response.

AOSS
1/

NRC Position

3.1.2 & 3.2.2

Licensees and applicants shall submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications, where required.

Response

As was stated in the reference 4 letter, maintenance procedures are more greatly impacted by vendor information than testing procedures since each successful utilization of a test procedure, in itself, constitutes a review of the procedure.

In April, 1984, Philadelphia Electric Company began the task of updating all of the existing Peach Bottom maintenance procedures. Approximately 320 maintenance procedures will be updated.

As part of carrying out this task, individual vendors are being contacted in order to determine if technical or methods changes have been made in their manuals which impact the procedure. Copies of updated material or revisions to the vendor manuals are being requested so that this hard copy information may be inserted into the Peach Bottom manuals. Copies of this information will also be provided to the Engineering Design Division of the Engineering and Research Department for logging and further distribution. Documentation of this vendor interface is provided via a form which has been generated to address vendor changes as each procedure is reviewed. This form, "Vendor Print Review", is provided as Attachment 1 and as indicated, requires the procedure reviewer to provide answers to specific questions to determine the extent and applicability of vendor changes to the procedure. A completed copy of this form will be included in the appropriate vendor manual history file, following procedure updating, as documentation that the vendor interface has been performed.

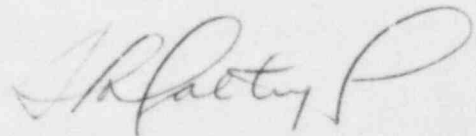
The current scheduling to perform this work has not prioritized those procedures and manuals regarding the reactor protection system over procedures and manuals regarding all other safety related equipment. Attachments 2 and 3, respectively, represent the current schedule for completion and the progress to date. The existing schedule

is subject to modification as required by changing plant maintenance requirements and the need to expedite the update of maintenance procedures for specific tasks.

In parallel with this effort, Philadelphia Electric Company has continued its participation in the BWR Owners Group generic effort for vendor manual updating. This subcommittee has recently been formed and it is expected that the initial efforts in this area will take approximately one year to complete.

Based on the scope and time required for the BWR Owners Group activity, Philadelphia Electric Company will modify our current plans and schedules or incorporate the results of the Owners Group subcommittee into our review of vendor manuals. The decision as to how we will proceed will be based on cost effectiveness as well as timeliness for completion for RPS manuals and all other safety related equipment manuals. We will provide to the Commission by August 31, 1984 the progress and any modifications to our existing program as a result of the Owners Group effort.

Very truly yours,



Attachments

cc: A. R. Blough, Site Inspector

COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF PHILADELPHIA :

S. L. Daltroff, being first duly sworn, deposes and
says:

That he is Vice President of Philadelphia Electric
Company; that he has read the foregoing partial response to
Generic Letter 83-28 and knows the contents thereof; and that the
statements and matters set forth therein are true and correct to
the best of his knowledge, information and belief.

S. L. Daltroff

Subscribed and sworn to
before me this *2nd* day
of *July*, 1984.

Patricia D. Scholl

Notary Public

PATRICIA D. SCHOLL
Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires February 10, 1986

VENDOR PRINT REVIEW

WRITER: _____ DATE CONTACTED: _____

PROCEDURE NUMBER/TITLE: _____

COMPONENT/UNIT: _____

COMPANY/OFFICE: _____

INDIVIDUAL CONTACTED/TITLE: _____

PHONE NUMBER: _____

PRINT NUMBER/INST. MANUAL: _____

LATEST PRINT/INST. MANUAL: _____

TELECON DESCRIPTION: _____

COMMENTS: _____

RD #1 Box 208
Delta, Pennsylvania 17314
717-456-7014 Ext.-

1984

Tentative Procedure Review Schedule

PRIORITY GROUP 1

COMPLETE AND SUBMITTED BY: 6/1/84

M-1.15 Deleted

M-1.16 Deleted

M-1.17 Deleted

M-1.22 Deleted

M-1.26 Deleted

M-2.10 Deleted

M-2.11 Deleted

M-12.22 Deleted

1984

Tentative Procedure Review Schedule

PRIORITY GROUP 2

COMPLETE AND SUBMITTED BY: 7/2/84

M-1.2	EHC System Flush
M-1.4	Deleted
M-1.9	Deleted
M-1.11	Deleted
M-3.2	Hydraulic Control Unit Repair
M-3.3	Control Rod Drive System Pump Repair

COMPLETE AND SUBMITTED BY: 8/1/84

M-1.14	Moisture Separator Drain Tank Manway Gasket Installation
M-1.21	Relief Valve Base Assembly Replacement
M-1.25	MSIV Air Cylinder and Dashpot Maintenance
M-4.10	Tip Drive Unit Maintenance
M-4.11	Installation and Removal of In-Vessel Rack

1984

Tentative Procedure Review Schedule

PRIORITY GROUP 2 (cont'd)

M-4.12	SRM/IRM Detector Drive Maintenance
M-4.13	Tip System Ball Valve Spring Adjustment
M-4.14	SRM or IRM Gearbox Realignment
M-8.3	Off-Gas Filter Maintenance
M-8.5	Recombiner Compressor Maintenance
M-8.7	Recombiner Heat Exchanger Maintenance
M-9.2	ASCO Valve Repair
M-10.16	Residual Heat Removal (RHR) Pump Mechanical Seal Maintenance

COMPLETE AND SUBMITTED BY: 9/3/84

M-11.1	Standby Liquid Control Pump Maintenance
M-11.3	Standby Liquid Control Accumulator Maintenance
M-12.1	Reactor Water Clean-Up (RWCU) Pump Maintenance

1984

Tentative Procedure Review Schedule

PRIORITY GROUP 2 (cont'd)

M-12.2	Reactor Water Clean-Up (RWCU) Heat Exchanger Maintenance
M-13.3	Reactor Core Isolation Cooling (RCIC) Pump Maintenance
M-19.1	Fuel Pool Filter Demineralizer Maintenance
M-23.1	High Pressure Coolant Injection (HPCI) Pump Drive Turbine Maintenance
M-33.1	Emergency Service Water (ESW) Pump Maintenance

COMPLETE AND SUBMITTED BY: 10/1/84

M-40.2	Ventilation Butterfly Valve Maintenance
M-48.1	Emergency Service Water Booster Pump Maintenance
M-48-2	Emergency Cooling Water Pump Maintenance (EMERGENCY COOLING TOWER)
M-52.5	Diesel Engine Supercharger Repair
M-52.6	Diesel Engine Bearing and Supercharger Inspection

1984

Tentative Procedure Review Schedule

PRIORITY GROUP 2 (cont'd)

M-52.14	Diesel Turbocharger Inspection
M-53.1	13.2KV Emergency Auxiliary Switchgear Maintenance
M-57.1	125V DC Equipment Maintenance

1984

Tentative Procedure Review Schedule

PRIORITY GROUP 3

COMPLETE AND SUBMITTED BY: 11/1/84

M-3.9	Replacement of CRD Ball Check
M-4.25	Instrument Handling Tool Air Cylinder Replacement
M-4.26	Fuel Support Casting Grapple Repair
M-4.28	CRD Thermal Sleeve Removal
M-4.29	CRD Thermal Sleeve Installation
M-4.34	Reactor Vessel Stabilizers Inspection and Repairs
M-4.35	Installation and Removal of Jet Pump Seal Plugs
M-4.38	Vibration Instrumentation Sensor and Hardware Removal
M-4.41	Reactor Vessel Stabilizers - Inspection and Minor Adjustments
M-4.42	Electrical Heating of Reactor Vessel Head
M-4.43	Coating Repairs to the Refueling Floor
M-4.68	Tip Indexer Maintenance

1984

Tentative Procedure Review Schedule

PRIORITY GROUP 3 (cont'd)

M-4.70 Unit 3 Emergency Hoist Operation

M-4.72 Removal of Surveillance Specimen

M-5.1 Visual Inspection Valves

M-6.2 Feedwater Long Path Recirc Valve Maintenance

COMPLETE AND SUBMITTED BY: 12/3/84

M-6.3 28A Drain Valves Replacement

M-6.4 Feedwater Sample Probe Removal

M-6.5 Feedwater Sample Probe Inspection

M-7.1 Visual Inspection of Vacuum Breakers

M-7.2 Torus Coating - Touch-Up

M-8.4 Recombiner Cartridge Replacement

M-8.6 Installing a 2 inch MK 131 Valve in the Unit 2 Mechanical
Compressor Discharge Tie Line to the Unit 3 Hold-Up Pipe

M-10.3 RHR Valve MO-154 Repair

1984

Tentative Procedure Review Schedule

PRIORITY GROUP 3 (cont'd)

M-10.4	MO-89 Valve Inspection
M-10.7	3-10-89B Valve Repair
M-10.10	RV35B Repair
M-10.12	MO-154 Disc and Skirt Repair
M-10.13	RHR Heat Exchanger Drain Temporary Repair
M-10.14	RHR Heat Exchanger Double Nut Installations
M-10.17	MO-10-89 B&C Valve Seat Repair (Machining)
M-10.18	RHR Pump Suction Header Drain Line Repair
M-10.19	RHR Pump Discharge Sensing Line Repair
M-11.2	Standby Liquid Control Explosive Valve Replacement

COMPLETE AND SUBMITTED BY: 12/31/84

M-13.1	Reactor Core Isolation Cooling (RCIC) Turbine Maintenance
M-13.2	RCIC Valve MO-2-13-16 Limitorgue Replacement

1984

Tentative Procedure Review Schedule

PRIORITY GROUP 3 (cont'd)

M-13.4	MO-13-15 or 16 Valve Maintenance
M-13.5	RCIC Turbine Exhaust Check Valve Maintenance
M-14.2	MO-14-11A and 11B or MO-14-12A and 12B Valve Maintenance
M-14.3	Core Spray Line Repair - A & B Loops
M-14.4	Core Spray Line Non-Destructive Test Weld Preparation and Verification - A & B Loops
M-14.5	Core Spray Line Weld 14-A-20 Recontour of Weld Crown Preparation
M-14.6	Core Spray Line Repair - A or B Loops
M-14.7	Core Spray Test Return Line to Torus - R.O. Removal Blank Installation and Blank Removal R.O. Installation
M-14.8	Core Spray Test Return Line Isolation Valve MO-14-26A Repairs
M-17.3	Reactor Building Crane Runway Realignment

1985

Tentative Procedure Review Schedule

PRIORITY GROUP 3

COMPLETE AND SUBMITTED BY: 2/1/85

M-19.2	Fuel Pool Work Table Support Bracket Straightening
M-23.3	MO-2-23-20 Valve Repair
M-23.4	HPCI Lube Oil Flush
M-23.5	HPCI Check Valves Maintenance (Valves 32, 61, 65)
M-23.6	HPCI Turbine Control Valve Linkage Modification
M-23.7	HPCI Hydraulic Drain Line Reinstallation
M-23.8	HPCI Turbine Speed Sensing Gear Locking Mechanism
M-32.4	HPSW Demin. Flush Tap
M-12.1	Reactor Water Clean-Up (RWCU) Pump Maintenance
M-12.2	Reactor Water Clean-Up (RWCU) Heat Exchanger Maintenance
M-12.3	RWCU Pump Vent Piping Replacement
M-12.4	Reactor Water Clean-Up System - Installation of Substitute 62 Check Valve

1985

Tentative Procedure Review Schedule

PRIORITY GROUP 3 (cont'd)

- M-12.5 Reactor Water Clean-Up Pump - Installation of 1-1/2" Flanges on Pump Discharge Line
- M-12.6 Reactor Water Clean-Up System Recirc Flow to Reactor - MO-12-68 Valve Maintenance
- M-12.7 Reactor Water Clean-Up System Recirc Flow to Reactor 12-62 Check Valve Maintenance
- M-12.8 Reactor Water Clean-Up System Regenerative Heat Exchangers Installation of Flanged Connecting
- M-12.9 Reactor Water Clean-Up System Regenerative Heat Exchanger's Solvent Cleaning Equipment Placement
- M-12.10 Reactor Water Clean-Up System Regenerative Heat Exchanger's Installation of Piping for Solvent Cleaning
- M-12.11 Reactor Water Clean-Up System Regenerative Heat Exchangers - Fabrication of 4" Spool Piece for Channel Outlet
- M-12.12 Reactor Water Clean-Up System Regenerative Heat Exchangers - Cleaning with NS-1

1985

Tentative Procedure Review Schedule

PRIORITY GROUP 3 (cont'd)

COMPLETE AND SUBMITTED BY: 3/1/85

M-12.13	Regenerative Heat Exchangers Seal Ring Installation
M-12.14	R.W.C.U. System Regenerative Heat Exchangers - Installation of Flanged Connections
M-12.15	R.W.C.U. System Regenerative Heat Exchangers - Installation of Equipment and Piping for Solvent Cleaning
M-12.16	R.W.C.U. System Heat Exchangers - Repairs to Channel-Diaphragm Seal Weld
M-12.17	R.W.C.U. Test Tap Installation
M-12.18	R.W.C.U. Gate Valves Maintenance (15 and 18)
M-12.19	Reactor Water Clean-Up System Regenerative Heat Exchangers Cleaning with NS-1
M-12.20	Regenerative Heat Exchangers Seal Ring Installation
M-12.21	R.W.C.U. System Chemical Cleaning Connection Removal
M-12.22	Deleted
M-12.23	Installation of 62 Check Valve in R.W.C.U. System

1985

Tentative Procedure Review Schedule

PRIORITY GROUP 3 (cont'd)

M-52.4	Diesel Generator Phase Current Transformer Replacement
M-52.7	Diesel Blower Filter Change & Gear Inspection
M-52.8	Diesel Govenor Change
M-52.9	Diesel Generator Turbosupercharger Inlet Filter Silencer Assembly Repair
M-57.2	24V DC Equipment Maintenance
M-57.4	Battery Charger Maintenance
M-57.6	24/130 VDC Charger Installation
M-57.7	24/130 VDC Spare Charger Installation
M-69.9	Hydraulic Snubber Lug Grinding
M-94.1	Torus Area - Installation of Demineralized Water Supply Valve and Tap

1985

Tentative Procedure Review Schedule

PRIORITY GROUP 4

COMPLETE AND SUBMITTED BY: 4/1/85

M-1.28	MSIV Pneumatic Control Manifold Rework
M-2.12	Repair of No. 2 'A' Recirculation Pump Low Pressure Cavity Pressure Sensing Line
M-2.13	65A Recirculation Pump Equilizer Valve Underseat Drain Line Repair
M-4.18	Service Platform Mechanical Inspection
M-4.71	Reactor Drain Line Freeze Plug
M-10.5	MO-89 Valve Seat Repair (Welding)
M-10.20	MO-2-10-25A, MO-2-10-25B, MO-3-10-25A, and MO-3-10-25B Valves Repair
M-10.21	HPSW Piping Test Tap Replacement
M-10.22	RHR Pump Suction Header Repair
M-10.23	RHR Pump Suction Header Repair
M-10.25	Valve Disc Seating Surface Repair
M-10.26	RHR Head Spray Pipe Repair

1985

Tentative Procedure Review Schedule

PRIORITY GROUP 4 (cont'd)

M-10.27	RHR Head Spray Pipe Partial Replacement
M-12.24	Removal of Spool Piece from 6" RWCU Line from Recirculation Pump Suction
M-12.25	RWCU MO-18 Valve and Ape Assembly Replacement
M-17.4	Reactor Building Crane Main Drum Pinion Gear Replacement
M-17.5	Reactor Building Crane Auxiliary Hook Load Test
M-19.3	Fuel Grapple Tube Repairs
M-32.5	HPSW Piping Test Tap Plug
M-33.2	Core Spray Pump Motor Oil Cooler Supply Line Cleaning and Replacement
M-52.10	Diesel Engine Main Bearing Changeout
M-57.3	125 Volt and 24 Volt Battery Corrective Maintenance

1985

Tentative Procedure Review Schedule

PRIORITY GROUP 5

M-1.8	MSIV Air Cylinder Repair
M-2.14	1" Loop Selection Interlock Line (270 Degrees Az Riser) Removal
M-2.15	1" Loop Selection Interlock Line Cap Installation at Drywell Penetration N-52
M-2.16	Recirc Pump Discharge Piping Hanger (H-9) Repair and Modification
M-3.11	CRD Scram Discharge Header Decontamination
M-3.12	Deleced
M-4.1A	Refueling Outage Preparation
M-4.20	Refueling Platform Electrical Inspection
M-4.53	Reactor Head Detensioning
M-4.59	Inspection of Equipment and Work Required Prior to Reactor Vessel Reassembly
M-4.73	Shroud Head Bolt Replacement
M-7.6	Outboard MSIV Room Penetration Boot Seal Replacement

1985

Tentative Procedure Review Schedule

PRIORITY GROUP 5 (cont'd)

- M-7.10 Replacement of Torus/Drywell Vacuum Breaker Hinge Arms, Hinge Pins, Hinge Pin Bushings, Pallet Seal and 24 inch "O" Ring
- M-10.9 RHR Gate Valves Maintenance (13, 15, 20, 26, 31, 39)
- M-10.28 Shutdown Cooling Pipe Support Repair
- M-10.29 RHR Full Flow Globe Valve - MO-10-34A
- M-10.30 3C RHR Motor Repair and Rewind

COMPLETE AND SUBMITTED BY: 6/1/85

- M-17.6 Reactor Building Crane Main Block Bronzoid Bushing Rework
- M-17.7 Diesel Building Crane Maintenance
- M-17.8 Reactor Building Crane Main Hoist Motor Pinion Replacement
- M-23.2 High Pressure Coolant Injection (HPCI) Pump Maintenance and Gear Box Assembly Maintenance (5 Yr. Inspection)
- M-23.10 HPCI Woodward Remote Servo Repair
- M-23.13 HPCI - Pump Drive Turbine Casing, Disassembly and Reassembly

1985

Tentative Procedure Review Schedule

PRIORITY GROUP 5 (cont'd)

- M-23.14 HPCI - Pump Drive Turbine Carbon Ring Inspection and/or Replacement
- M-23.15 HPCI Overspeed Trip Device
- M-23.16 High Pressure Coolant Injection (HPCI) Pump Drive Turbine Journal and Thrust Bearing Disassembly, Inspection and Reassembly
- M-23.17 HPCI Turbine 5 Year Inspection
- M-23.19 High Pressure Coolant Injection (HPCI) Pump Drive Turbine IMP Pump Changeout
- M-23.20 High Pressure Coolant Injection (HPCI) Exhaust Drain Line Repair
- M-23.21 1.3 HP 230 FVC Valdor Motor Reconditioning for HPCI Condensate Pump

COMPLETE AND SUBMITTED BY: 7/1/85

- M-32.6 HPSW Pipe Spool Repair
- M-32.7 HPSW Pumps Motor Oil Cooler Water Supply Relocation
- M-52.11 Diesel Engine Cylinder Liner Replacement

1985

Tentative Procedure Review Schedule

PRIORITY GROUP 5 (cont'd)

M-52.12	Vertical Drive Inspection and Repair
M-52.13	Diesel Generator Oil Storage Tanks Clean Out
M-65.1	Hydraulic Snubber Overhaul
M-65.10	Mechanical Snubber Surveillance
M-65.11	Hydraulic Snubbers Extension Piece Length Modification
M-GE-2	CRD Thermal Sleeve Removal and Installation
M-GE-3	Installation and Removal of Jet Pump Seal Plugs

COMPLETE AND SUBMITTED BY: 12/31/85

Review of Remaining 125 Procedures

1984

Updated Procedures Approved by the Plant Operations Review Committee

<u>PROCEDURE</u>	<u>REV.</u>	<u>TITLE</u>	<u>DATE APPROVED</u>
M-1.3	10	Main Steam Isolation Valve Maintenance	2/16/84
M-1.6	9	Relief Valve Replacement	6/13/84
M-2.1	10	Reactor Recirculation Pump Seal Overhaul	6/13/84
M-3.1	16	Control Rod Drive Replacement	5/25/84
M-4.2	13	Opening the Reactor Vessel	4/25/84
M-4.36	8	Steam Line Plug Installation	4/25/84
M-4.51	6	Removal of Drywell Head	4/25/84
M-4.52	7	Removal of Reactor Vessel Head	4/30/84
M-9.1	10	Limiterorque Switches Inspection, Maintenance, Adjustment, Lubrication	5/23/84
M-14.1	4	Core Spray Pump Maintenance	5/18/84
M-23.5	2	HPCI Check Valves Maintenance (Valves 32, 61, 65)	6/1/84
M-54.1	9	4Kv Emergency Auxiliary Switchgear Maintenance	6/1/84