

10 CFR 50.55a

**PECO NUCLEAR**

A UNIT OF PECO ENERGY

PECO Energy Company  
Nuclear Group Headquarters  
965 Chesterbrook Boulevard  
Wayne, PA 19087-5691

May 28, 1996

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  
Submittal of Revision 1 to Relief Request No. GVRR-1, Second Ten Year Interval of  
the Inservice Testing (IST) Program

Reference: Letter from G.A. Hunger, Jr. (PECO Energy Company) to U. S. Nuclear Regulatory  
Commission, dated February 15, 1996

Dear Sir:

Attached for your review and approval is Relief Request No. GVRR-1, Revision 1 for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3 Second Ten Year Interval Inservice Testing (IST) Program. PECO Energy Company (PECO Energy) requests that this Relief Request be approved by July 19, 1996 in order to avoid performing Local Leak Rate Testing currently scheduled to begin in August, 1996.

In the Referenced letter containing License Change Request No. 95-11, PECO Energy Company requested changes to the PBAPS, Units 2 and 3 Technical Specifications which would permit the implementation of 10 CFR 50, Appendix J, Option B at PBAPS, Units 2 and 3. This License Change Request contained the justification for changing to a performance-based frequency for leak rate testing of Containment Isolation Valves. Using the same justification, PECO Energy requests relief from the testing requirements contained in ASME Section XI, 1980 Edition through Winter 1981 Addendum, Subsubsection IWV-3420. This specifies that Containment Isolation Valve testing is performed every 2 years. As an alternative, PECO Energy requests that Category A Containment Isolation Valves be tested in accordance ASME/ANSI OMa-1988, Part 10, "Inservice Testing of Valves in Light-Water Reactor Power Plants," Paragraph 4.2.2, "Valve Seat Leakage Rate Test." This alternative will allow PBAPS, Units 2 and 3 to test Category A Containment Isolation Valves in accordance with 10 CFR 50, Appendix J, Option B. Additionally, In accordance with 10 CFR 50.55a(b)(2)(vii), leakage rates for Category A Containment Isolation Valves that do not provide a reactor coolant system pressure isolation function will be analyzed in accordance with paragraph 4.2.2.3(e) of Part 10 and corrective actions will be made in accordance with paragraph 4.2.2.3(f) of Part 10.

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If you have any questions, please contact us.

Very truly yours,

*G. A. Hunger, Jr.*

G. A. Hunger, Jr.  
Director - Licensing

Enclosure

cc: T. T. Martin, Administrator, Region I, USNRC  
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS

## RELIEF REQUEST GVRR-1, REVISION 1

Valves: Containment Isolation Valves (CIVs)

Category: A

Test Requirement: Leak rate test in accordance with ASME Section XI, 1980 Edition through Winter 1981 Addenda, Subsubsection IWV-3420.

Basis for Relief: By rulemaking effective September 8, 1992 (Federal Register Vol. 57, 34666), the NRC approved, by incorporation by reference, the 1989 Edition of the ASME Code, Section XI. This edition of the ASME Code requires valve testing to be performed in accordance with the requirements of ASME/ANSI OMa-1988, Part 10. OM-10 revised the requirements of valve leak rate testing including allowance for testing of CIVs in accordance with 10 CFR 50, Appendix J.

Alternate Testing: Category A valve leakage testing shall be performed in accordance with ASME/ANSI OMa-1988, Part 10, "Inservice Testing of Valves in Light-Water Reactor Power Plants," Paragraph 4.2.2, "Valve Seat Leakage Rate Test." Additionally, analysis of leakage rates shall be in accordance with paragraph 4.2.2.3(e) of Part 10 and corrective actions for these valves will be made in accordance with paragraph 4.2.2.3(f) of Part 10.