

## PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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September 18, 1992

NUCLEAR SERVICES DEPARTMENT

Docket Nos. 50-277  
50-278  
50-352  
50-353

License Nos. DPR-44  
DPR-56  
NPF-39  
NPF-85

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3  
Limerick Generating Station, Units 1 and 2  
Supplemental Response to NRC Generic Letter 88-20  
Supplement 4, "Individual Plant Examination of  
External Events for Severe Accident Vulnerabilities"

REFERENCE: Letter from D. R. Helwig, (PECo) to NRC dated  
December 26, 1991

Dear Sir:

NRC Generic Letter (GL) 88-20, Supplement 4, "Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities," dated June 28, 1991, required licensees to submit within 180 days from the issuance date of the GL a response which describes their proposed programs for completing the IPEEE. The GL stated that the response should:

1. identify the methods and approach selected for performing the IPEEE,
2. describe the method to be used if it has not been previously submitted for staff review (the description may be by reference), and
3. identify the milestones and schedule for performing the IPEEE, and submitting the results to the NRC.

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The referenced letter provided Philadelphia Electric Company's (PECO) response to GL 88-20 Supplement 4, wherein we identified the methods and approach for performing the IPEEE at Peach Bottom Atomic Power Station (PBAPS) and Limerick Generating Station (LGS). The letter did not however identify milestones or completion schedules for performing the IPEEE at either PBAPS or LGS. We informed the NRC at that time of our preference to coordinate our IPEEE seismic evaluations and the actions to complete Unresolved Safety Issue (USI) A-46, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors" for PBAPS, by combining plant walkdowns for each program into a single effort.

In order to coordinate this effort, we were awaiting the issuance of the Supplemental Safety Evaluation Report (SSER) on the Seismic Qualification Utility Group's (SQUG's) Generic Implementation Procedure (GIP) for resolution of USI A-46. In lieu of completion schedules, we committed to providing a supplemental response to GL 88-20 Supplement 4, 120 days after the receipt of the GIP SSER, which was subsequently issued on May 22, 1992. The supplemental response would provide the specific completion schedules for performing the IPEEE at PBAPS and LGS.

Accordingly, Attachments 1 and 2 to this letter are the IPEEE milestones and completion schedules for PBAPS and LGS respectively. It should be noted that the milestone dates are estimates and are being provided for information purposes. While every effort will be made to meet the milestone dates, we do not intend to inform the NRC if a revision to them becomes necessary unless such a revision would cause the submittal of the final report to be delayed.

As indicated in the Attachments, our schedule calls for the completion of the LGS IPEEE by June 30, 1995, and by November 20, 1995, for PBAPS.

GL 88-20, Supplement 4, requested licensees to submit their IPEEE results to the NRC within three years from the issuance date of the GL (i.e., June 28, 1994). However, due to the delay in issuance of the GIP, the NRC has stated that they would consider submittal extensions beyond that date on a case by case basis, but in no case beyond June 1995.

We have found it necessary to extend the PBAPS IPEEE completion date beyond June 1995, for the following reasons.

- 1) We plan to conduct a significant portion of the IPEEE evaluation in house.
- 2) We plan to coordinate the PBAPS IPEEE seismic and USI A-46 system walkdowns. This effort will therefore be larger in scope than the IPEEE required walkdown at LGS.

- 3) We have multiple units to evaluate.
- 4) The required equipment walkdowns are constrained by the units' outage schedules.

We are available, at the NRC's convenience, to discuss the PBAPS IPEEE completion schedule if necessary.

If you have any questions concerning this submittal or require additional information, please contact us.

Sincerely,



G. J. Beck, Manager  
Licensing Section

Attachments

cc: T. T. Martin, Regional Administrator, Region I  
J. J. Lyash, USNRC Senior Resident Inspector, PBAPS  
T. J. Kenny, USNRC Senior Resident Inspector, LGS

ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3  
SUPPLEMENTAL RESPONSE TO GENERIC LETTER 88-20 SUPPLEMENT 4,  
INDIVIDUAL PLANT EXAMINATION OF EXTERNAL EVENTS (IPEEE)  
FOR SEVERE ACCIDENT VULNERABILITIES"

MILESTONES AND SUBMITTAL SCHEDULE

<u>MILESTONE</u>	<u>DATE</u>
- Perform Pre-Seismic Walkdown Activities	September 30, 1993
- Perform Unit 3 Seismic Walkdown	January 31, 1994
- Perform Unit 2 Seismic Walkdown	November 30, 1994
- Perform Other External Events Evaluations	August 31, 1994
- Perform Fire Analysis	March 31, 1995
- Assess Vulnerabilities, Prepare Draft Report, and Obtain Management Approval	October 30, 1995
- Submit Final Report to NRC	November 20, 1995

ATTACHMENT 2

LIMERICK GENERATING STATION, UNITS 1 AND 2  
SUPPLEMENTAL RESPONSE TO GENERIC LETTER 88-20 SUPPLEMENT 4  
"INDIVIDUAL PLANT EXAMINATION OF EXTERNAL EVENTS (IPEEE)  
FOR SEVERE ACCIDENT VULNERABILITIES"

MILESTONES AND SUBMITTAL SCHEDULE

<u>MILESTONE</u>	<u>DATE</u>
- Perform Pre-Seismic Walkdown Activities	February 28, 1993
- Perform Unit 2 Seismic Walkdown	September 30, 1993
- Perform Unit 1 Seismic Walkdown	April 30, 1994
- Perform Other External Events Evaluations	May 31, 1994
- Perform Fire Analysis	October 31, 1994
- Assess Vulnerabilities, Prepare Draft Report, and Obtain Management Approval	May 31, 1995
- Submit Final Report to NRC	June 30, 1995