1881 1981

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

RECEIVED
APR 30 1981
U.S. NUCLEAR REGULATORY COMMISSION

April 23, 1981

Re: Docket Nos. 50-277
50-278

Mr. Darrell G. Eisenhut, Director
Division of Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Eisenhut:

This correspondence requests a revision to the leak reduction program committed to in a letter from S. L. Daltroff, Philadelphia Electric Company, to H. R. Denton, NRC, dated January 2, 1980. The commitment was in response to the Short Term Lessons Learned (NUREG 0578), Section 2.1.6a, requirement for all licensees to develop a leak reduction program to reduce leakage from systems outside containment that may contain highly radioactive fluids during a serious transient or accident.

The Nuclear Regulatory Commission on October 28, 1980 issued Amendment Nos. 74 and 73 to Facility Operating Licenses Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station. These amendments included a change to the Technical Specifications requiring the leakage reduction program addressed in NUREG 0578, section 2.1.6A. Therefore, we propose that the leakage reduction program as required by the Technical Specifications supersede the previous commitment described in the correspondence referenced above. This would permit adjustments in the program without changing the intent of the leakage control program as specified in the Technical Specifications. The adjustments are as follows:

1. The leakage reduction program described in the correspondence referenced above identified two tests for the Reactor Water Cleanup System (RWCU). The first involved an operational hydrostatic test during each refueling outage, at 1000 psig. Additionally, a second test was proposed at 49.1 psig during the integrated

A001
S
1/0

P

8105010273

leak rate test (ILRT) every 3 1/2 years. The operational hydrostatic test represents a more stringent and meaningful test. Therefore, to eliminate redundancy in the testing program, it is proposed that the requirement to test the RWCU during the ILRT be deleted.

2. The correspondence referenced above proposed a leak test of the Standby Gas Treatment System (SBGTS). Further analysis indicates that a leak test of this system is inappropriate for the following reason. In the event of a LOCA, the SBGTS starts automatically, the reactor building is isolated, and the SBGTS automatically aligns to take suction on the reactor building. The gases flowing inside the SBGTS ducts in the reactor building are the same as exists outside the ducts (reactor building atmosphere). Release of primary containment gases to the SBGTS is controlled by a one inch valve and must be initiated manually. The venting rate can be controlled to ensure a negative pressure in the SBGTS ducts. Therefore, it is proposed that the SBGTS test be deleted from the program.

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

Very truly yours,