

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

July 3, 1985

Docket Nos. 50-277
50-278

Mr. John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Peach Bottom Atomic Power Station
Containment Purge and Vent Valve Technical
Specifications

REFERENCE: Correspondence dated February 20, 1985
J. F. Stolz, NRC, to E. G. Bauer, Jr., PECO

Dear Mr. Stolz:

The referenced correspondence approved a greater maximum open position for the containment purge and vent valves contingent upon completion of modifications described in an April 24, 1984 letter, S. L. Daltroff, PECO, to J. F. Stolz, NRC. Further, the referenced correspondence recommended an addition to the Technical Specifications to reflect the open position limitation, and a maximum five second closing time limitation.

A revision to the closing time specification is not necessary since Table 3.7.1, Primary Containment Isolation Valves, of the Peach Bottom Technical Specifications currently requires a five second stroke time for the containment purge and vent valves.

The modifications to the valves will include the installation of a mechanical stop that will physically prevent the valve from exceeding the maximum open position. This design feature will ensure compliance with the position limitations. Consequently, attention by the control room operator to this limitation will not be necessary. As an alternative to specifying the valve position

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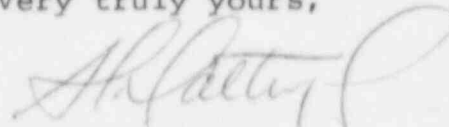
limits in the Technical Specifications, we propose to describe the valve position limits and their bases in the first Updated FSAR following completion of the modification. The rationale for this proposal is as follows:

1. The valve position limits are controlled by equipment design, and are therefore not under the control of the control room operators. The concept of Technical Specification simplification dictates that the document should be oriented to the operators by limiting its content to the operating limits under their control. The Updated FSAR is the appropriate document for describing the essential design features of the facility.
2. The addition of design features to the Technical Specifications adds to the complexity and volume of the document and lessens the likelihood that operators would focus attention on matters of importance to safe operation of the facility.
3. The addition of design features to the Technical Specifications precludes the ability to implement design changes under the provisions of 10 CFR 50.59. Design changes subject to the license amendment process involves a significant work load for both utility and NRC staffs, and subjects plant design improvements to a very time consuming and complex review process.

This approach is offered for your consideration in the interest of Technical Specification simplification, and streamlining the licensing process.

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

Very truly yours,



cc: T. P. Johnson, Resident Site Inspector