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May 29, 1985

Docket No. 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 - Units 2 and 3
Generic Letter 83-28 - "Required Action Based on
Generic Implications of Salem ATWS Events"

REFERENCE: Letter to J. F. Stolz, USNRC, to
E. G. Bauer, Jr. PECO., March 14, 1985

Dear Mr. Stolz:

The reference letter forwarded the NRC assessment of the completeness and adequacy of our responses to the subject Generic Letter for Peach Bottom Units 2 and 3.

The results of the NRC review are restated below along with our response.

Item 2.1 (Part 2) - Incomplete:

The licensee needs to confirm that the review of the RTS classification program is complete and that it verifies that RTS components are classified as safety-related and are identified as such on all documents and in information handling systems.

RESPONSE:

All systems that contribute to the reactor trip function have been identified as being in the current 'Q' list. Consequently, all components on the identified systems,

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unless specifically excluded by a unique safety evaluation, are subject to the Quality Assurance program.

In accordance with approved Peach Bottom Administrative Procedures and Engineering and Research Department Procedures regarding procurement, each item or service to be procured must be reviewed to determine whether or not it is safety related. This review is performed by a cognizant member of the Plant Staff or the Engineering and Research Department as applicable. The determination is guided by the 'Q'-list, applicable codes and standards, the Final Safety Analysis Report and information from the Architect Engineer and the NSSS supplier.

Philadelphia Electric Company believes the current Peach Bottom 'Q' list and the existing procedural controls governing its use are adequate to meet the intent of Generic Letter 83-28.

Item 2.2.2 - Incomplete

The licensee's response is based on the NUTAC report. The licensee needs to present his evaluation of the NUTAC program and describe how it will be implemented at Peach Bottom. The staff found that the NUTAC program fails to address the concern about establishing and maintaining an interface between all safety-related equipment vendors and the utility. Accordingly, the licensee will need to supplement his response to address this concern. This additional information should describe how current procedures will be modified and new ones initiated to meet the elements of this concern.

RESPONSE:

During Philadelphia Electric Company's participation in the INPO NUTAC program, we evaluated the merits of the program in addressing the NRC position contained in item 2.2.2 of the Generic Letter. Although there is little incentive for equipment manufacturers to be cognizant of equipment maintenance histories and failures, there is high incentive for utilities to maintain the type of information exchange described within the Vendor Equipment Technical Information Program (VETIP) as defined in the March 1984 NUTAC Report for both plant safety and reliability considerations.

Philadelphia Electric Company has implemented the program described in the Vendor Equipment Technical Information Program as committed in letter S. L. Daltroff, PECO., to D. G. Eisenhut, USNRC, dated April 23, 1984 by issuance of the following administrative and implementing procedures:

- LS-A-1 Administrative Procedure for Review, Disposition and Monitoring of Responses to NRC IE Bulletins, IE Information Notices, and Division of Licensing Generic Letters
- LS-A-2 Administrative Procedure for Participation in Nuclear Plant Reliability Data System
- LS-I-5 Implementing Procedure for Utilization of the INPO NPRD System
- LS-I-6 Implementing Procedure for Review, Disposition and Monitoring Nuclear Regulatory Commission IE Bulletins, IE Information Notices and Division of Licensing Generic Letters
- NS-A-5 Administrative Procedure for Review and Implementation of Operating Experience Information for Vendor Manual Maintenance

In addition to the above listed procedures, the following existing procedures, which have been prepared as a result of Generic Letter 83-28, are applicable to Items 1, 3, and 4 of the NUTAC Program:

- NSS-I-4 Procedure for Review and Utilization of Operating Experience Information
- NSS-I-5 Procedure Governing the Use of the Institute of Nuclear Power Operations Nuclear Network
- ERDP 6.4 Procedure for Control of Vendor Technical Manuals

The requirements for controls for vendor services which are safety-related contained in the NUTAC program are specified in procedure A-27, Procedure for Material Control System for Peach Bottom.

Based on the program developed by Philadelphia Electric Company in accordance with the NUTAC-VETIP program, it is requested that NRC re-evaluate this program as a valid response to item 2.2.2 of the Generic Letter.

Item 4.5.3 - Incomplete

The staff finds that modifications are not required to permit on-line testing of the backup scram valves. However, the staff concludes that testing of the backup scram valves (including initiating circuitry) at a refueling outage frequency, in lieu of on-line testing, is appropriate and should be included in the technical specifications surveillance requirements. The licensee needs to address this conclusion.

Regarding the scram pilot valves (including all initiating circuitry), the licensee needs to provide the results of a review of existing or proposed intervals for on-line testing considering the concerns of sub-items 4.5.3.1 to 4.5.3.5 of the generic letter. The response shall show how these intervals result in high reactor trip system availability and present proposed technical specification changes for staff review.

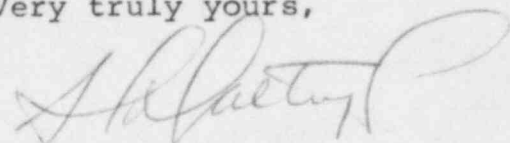
RESPONSE:

Philadelphia Electric Company participated in the BWR Owners Group effort to address the review of existing technical specification intervals for testing reactor trip system components. By way of this letter, Philadelphia Electric Company endorses the "BWR Owners Group Response to NRC Generic Letter 83-28, Item 4.5.3" (NEDC-30844) for Peach Bottom Units 2 and 3. This report was transmitted for NRC staff review on January 31, 1985 via letter, John M. Fulton, Chairman BWROG to D. G. Eisenhut, USNRC.

In accordance with the instructions contained in the reference letter, our plant specific response for item 4.5.3 will be submitted within 90 days after NRC issues its evaluation of NEDC-30844.

Should you require any additional information, please do not hesitate to contact us.

Very truly yours,



cc: T. P. Johnson, Resident Site Inspector