

**PECO NUCLEAR**

A Unit of PECO Energy

PECO Energy Company  
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March 3, 2000

Docket Nos. 50-277  
50-278License Nos. DPR-44  
DPR-56U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555Subject: Peach Bottom Atomic Power Station, Units 2 and 3  
Third, Ten-Year-Interval Inservice Inspection (ISI) Program

- References:
- 1) Letter from J. Doering, Jr. (PECO Energy Company) to U. S. Nuclear Regulatory Commission (USNRC), dated August 13, 1998
  - 2) Letter from B. C. Buckley (USNRC) to PECO Energy Company, dated August 20, 1999
  - 3) Letter from J. A. Hutton (PECO Energy Company) to USNRC, dated October 8, 1999

Dear Sir/Madam:

In the Reference 1 letter, PECO Energy Company (PECO Energy) provided for your review and approval proposed alternatives associated with the third, ten-year-interval, Inservice Inspection (ISI) Program for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. In a telephone call between PECO Energy Company, U. S. Nuclear Regulatory Commission, and Idaho National Engineering Laboratory personnel on February 17, 2000, PECO Energy was requested to provide additional clarification regarding Relief Request 32.

Relief Request 32 has been clarified as follows:

1. The relief has been revised to state that when the engineering evaluation of the Class 1, 2, and 3 bolting indicates the need for further examination, the bolt closest to the source of leakage will be removed, receive a visual VT-1 examination, and be evaluated in accordance with IWA-3100(a).
2. Reference to "a visual VT-3" contained in the "Basis for Alternative" has been deleted to ensure that the relief would not require a VT-3 examination.

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3. The "Proposed Alternative Examination" has been clarified to state that "the requirements of (a) or (b) below shall be met." This wording aligns with the wording of Code Case N-566-1, and will eliminate any potential confusion in the use of requirement (a) and (b) in the future.

If you have any questions, please contact us.

Very truly yours,



James A. Hutton, Jr.  
Director-Licensing

Attachment

cc: H. J. Miller, Administrator, Region I, USNRC  
A. C. McMurtray, USNRC Senior Resident Inspector, PBAPS

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**COMPONENT IDENTIFICATION**

Code Classes: 1, 2, and 3  
Reference: IWA-5250(a)(2)  
Code Case N-566-1  
Examination Category: Not Applicable  
Item Number: Not Applicable  
Description: Alternative Rules for Corrective Measures if Leakage  
Occurs at a Bolted Connection  
Component Numbers: Class 1, 2, and 3 Pressure-Retaining Bolted  
Connections

**CODE REQUIREMENT**

ASME, Section XI, 1989 Edition, Subparagraph IWA-5250(a)(2), states, "if leakage occurs at a bolted connection, the bolting shall be removed, VT-3 visually examined for corrosion, and evaluated in accordance with IWA-3100."

**BASIS FOR ALTERNATIVE**

Pursuant to 10CFR50.55a(a)(3)(ii), relief is requested on the basis that compliance with Section XI requirements would result in hardship without a compensating increase in the levels of quality and safety.

Removal of bolting at a mechanical connection may not be the most prudent decision and may cause undue hardship without a compensating increase in the level of quality or safety. The environment at a leaking bolted connection is one of many variables to consider when evaluating leakage at a bolted connection. Other variables to be considered are: bolting materials, leaking medium, duration of the leak, and orientation of the leak (not all the bolts may be wetted). These variables are important to consider before disassembling a bolted connection for an examination. PECO Energy proposes an alternative to the requirements of IWA-5250(a)(2) that will provide an equivalent level of quality and safety at Class 1, 2, and 3 bolted connections.

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**PROPOSED ALTERNATIVE EXAMINATION**

Leakage discovered at a bolted connection by visual VT-2 examination during system pressure testing will be evaluated to determine the susceptibility of the bolting to corrosion and potential future failure. The evaluation, including subsequent examinations when required, will, as a minimum, be performed in compliance with Code Case N-566-1, with an additional requirement that the evaluation consider the need for additional testing of the bolting and joint material to determine the susceptibility of the bolting to corrosion and failure.

The requirements of (a) or (b) below shall be met:

- (a) The leakage shall be stopped, and the bolting and component material shall be evaluated for joint integrity as described in (c) below.
- (b) If the leakage is not stopped, the joint shall be evaluated in accordance with IWB-3142.4 for joint integrity. This evaluation shall include the considerations listed in (c) below.
- (c) The evaluation of (a) and (b) above is to determine the susceptibility of the bolting to corrosion and failure. This evaluation shall include the following:
  - (1) the number and service age of the bolts;
  - (2) bolt and component material;
  - (3) corrosiveness of process fluid;
  - (4) leakage location and system function;
  - (5) leakage history at the connection or other system components;
  - (6) visual evidence of corrosion at the assembled connection;
  - (7) consideration of need for follow-up examination, testing, and analysis of bolting materials to determine the susceptibility of the bolting to corrosion and failure;
  - (8) When evaluation of the above items indicates the need for further examination, the bolt closest to the source of leakage will be removed, receive a visual VT-1 examination, and be evaluated in accordance with IWA-3100(a).

**APPLICABLE TIME PERIOD**

Relief is requested for the third, ten-year interval of the Peach Bottom Atomic Power Station Inservice Inspection Program, beginning November 5, 1998, for Unit 2, and August 15, 1998, for Unit 3.