



PECO NUCLEAR

A UNIT OF PECO ENERGY

MA 5958
MA 5959
10 CFR 50.55a

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

June 24, 1999

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

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

Subject: Peach Bottom Atomic Power Station, Units 2 and 3
Submittal of Relief Requests associated with the Second 10 Year
Interval Inservice Interval (ISI) Program

Dear Sir/Madam:

Attached for your review and approval are seven (7) proposed relief requests and one (1) alternative associated with the end of the second, ten-year-interval, Inservice Inspection (ISI) Program for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. The second, ten-year-interval concluded for PBAPS, Units 2 and 3 on November 4, 1998, and August 14, 1998, respectively.

These seven (7) relief requests and one (1) alternative are being submitted in accordance with 10 CFR 50.55a(g)(5)(iv) within 12 months from the completion of the interval. The seven (7) (six (6) new and one (1) revised) relief requests are being submitted per 10 CFR 50.55a(g)(5) based on impracticality. The one (1) proposed alternative is being requested per 10 CFR 50.55a(a)(3)(i) for an examination performed after the closure of the interval.

If you have any questions, please contact us.

Very truly yours,

G. D. Edwards
Director - Licensing

Attachment

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

A047

Rec'd at DOW
on 7/17/99
John J. Biskin

ATTACHED RELIEF REQUESTS

Relief Request RR-13
Relief Request RR-24
Relief Request RR-34
Relief Request RR-35
Relief Request RR-36
Relief Request RR-37
Relief Request RR-38
Relief Request RR-39

RELIEF REQUEST NO. RR-13
Revision 2
Submitted as final documentation.

Note: Revision 1 of this relief was approved in an NRC SER dated 12/23/92.
The revision 2 changes are indicated with a revision bar in the margin and noted in the tables.

I. IDENTIFICATION OF COMPONENTS

ISI Class 1 full penetration nozzle to vessel welds in the reactor pressure vessel, Code Examination Category B-D, Item Number B3.90.

II. CODE REQUIREMENTS FROM WHICH RELIEF IS REQUESTED

ASME Section XI 1980 Edition Winter 1981 Addenda, Code Category B-D requires volumetric examination of the nozzle to vessel welds (full penetration) of all nozzles in the reactor pressure vessel during the second inservice inspection interval.

Relief is requested from performance of a complete examination of the Code required volume due to access restrictions as a consequence of plant design and/or component configuration.

III. BASIS FOR RELIEF

PBAPS has thirty-one (31)⁶ Code Category B-D nozzle to vessel attachment welds on each unit, many of which cannot be completely examined due to vessel nozzle forging configuration. The barrel type nozzle forging configuration precludes complete ultrasonic examination since scanning of the weld is only practical from one side of the weld. Also, in support of ALARA, many of the nozzle to vessel welds are examined utilizing a remote automated nozzle scanner; thereby, slightly exaggerating the limitations, versus a manual examination, due to scanner design. In addition to the nozzle forging configuration, physical plant design restrictions, such as adjacent components, further limit the available scan path.

Tables RR-13-1 (Unit 2) and RR-13-2 (Unit 3) list the nozzle to vessel welds and detail the extent of examinations completed. The tables show information from the Rev 1 submittal and the supplemental information required for this submittal.

All examinations are performed to the maximum extent practical. In the case of examinations performed utilizing remote automatic equipment, only a very slight increase in examination coverage ($\approx 5\%$) can be realized with supplemental manual exams; however, this small increase comes with a significant increase in personnel exposure, and, therefore, manual examination was not performed.

Limited volumetric examination coupled with the visual examination requirements of Code Examination Category B-P during system pressure testing provide reasonable assessment of weld structural integrity.

IV. ALTERNATE PROVISIONS

No alternate provisions are practical for these examinations.

RELIEF REQUEST NO. RR-13 REV. 2 (CONTD)

TABLE RR-13-1

Effect of Nozzle Design Configuration on Component Inspectability¹
Examination Category B-D, Item No B3.90

Unit 2

Nozzle Identification/Description	Actual Data Reported in Rev 1 of this relief			Added information per Rev 2
	Type Scan (note 2)	% Code Complete (note 3)	% Inner 1/4T Code Complete (note 4)	% Composite Coverage (note 8)
N1A Recirculation Outlet	45T	17.2 (A)	41.5 (A)	
	60T	28.3 (A)	66.9 (A)	
	60P	23.6 (A)	57.2 (A)	
N1B Main Recirc Outlet	--	--	--	28.5
N2A Recirculation Inlet	45T	29.1 (A)	51.5 (A)	
	60T	37.4 (A)	71.1 (A)	
	60P	23.0 (A)	43.9 (A)	
N2B Recirculation Inlet	45T	28.7 (A)	50.8 (A)	
	60T	36.9 (A)	70.1 (A)	
	60P	22.7 (A)	43.2 (A)	
N2C Recirculation Inlet	45T	28.7 (A)	50.8 (A)	
	60T	36.9 (A)	70.1 (A)	
	60P	24.0 (A)	45.8 (A)	
N2D Recirculation Inlet	45T	29.5 (A)	52.2 (A)	
	60T	37.9 (A)	72.1 (A)	
	60P	23.4 (A)	44.5 (A)	
N2E Recirculation Inlet	45T	32.0 (A)	56.7 (A)	
	60T	41.1 (A)	78.1 (A)	
	60P	25.7 (A)	48.9 (A)	

RELIEF REQUEST NO. RR-13 REV. 2 (CONTD)

Unit 2

Nozzle Identification/Description	Actual Data Reported in Rev 1 of this relief			Added information per Rev 2
	Type Scan (note 2)	% Code Complete (note 3)	% Inner 1/4T Code Complete (note 4)	% Composite Coverage (note 8)
N2F Recirculation Inlet	45T	28.2 (A)	50.0 (A)	
	60T	36.3 (A)	69.0 (A)	
	60P	22.4 (A)	42.6 (A)	
N2G Main Recirc Inlet	--	--	--	36.6
N2H Recirculation Inlet	45T	33.6 (A)	59.6 (A)	
	60T	43.2 (A)	82.2 (A)	
	60P	26.7 (A)	50.8 (A)	
N2J Main Recirc In	--	--	--	41.7
N2K Main Recirc In	--	--	--	37.4
N3A Main Steam	45T	9.6 (A)	33.4 (A)	
	60T	23.7 (A)	66.9 (A)	
	60P	11.3 (A)	40.1 (A)	
N3B Main Steam	--	--	--	17.4
N3C Main Steam	--	--	--	18.1
N3D Main Steam	45T	8.9 (A)	31.2 (A)	
	60T	22.2 (A)	62.5 (A)	
	60P	10.4 (A)	36.7 (A)	
N4A Feedwater	--	--	--	29.3
N4B Feedwater	--	--	--	30.7
N4C Feedwater	--	--	--	33.0

RELIEF REQUEST NO. RR-13 REV. 2 (CONTD)

Unit 2

Nozzle Identification/Description	Actual Data Reported in Rev 1 of this relief			Added information per Rev 2
	Type Scan (note 2)	% Code Complete (note 3)	% Inner 1/4T Code Complete (note 4)	% Composite Coverage (note 8)
N4D Feedwater	--	--	--	36.3
N4E Feedwater	--	--	--	27.2
N4F Feedwater	--	--	--	28.2
N5A Core Spray	45T	23.6 (A)	46.7 (A)	
	60T	34.2 (A)	65.1 (A)	
	60P	19.7 (A)	39.4 (A)	
N5B Core Spray	45T	23.6 (A)	46.7 (A)	
	60T	34.2 (A)	65.1 (A)	
	60P	19.7 (A)	39.4 (A)	
N6A CH-NA Nozzle				36.2
N6B CH-NC Nozzle				35.6
N8A Jet Pump Instrumentation	45T	92.4 (M)	100.0 (M)	
	60T	93.0 (M)	100.0 (M)	
	45P	80.1 (M)	83.7 (M)	
	60P	80.1 (M)	83.7 (M)	
N8B Jet Pump Instrumentation	--	--	--	76.7
N9 Control Rod Drive Nozzle				25.8
N10 SBLC Nozzle	--	--	--	0% (note 7)

RELIEF REQUEST NO. RR-13 REV. 2 (CONTD)

Footnotes for Table RR 13-1:

- 1) Component inspectability is based on actual examination results.
- 2) Unless indicated, a 45 degree parallel scan is not practical due to weld configuration.
- 3) % Code complete is that percent of the ASME Code required examination volume which can effectively be examined using automated (A) or manual (M) ultrasonic examination techniques.
- 4) % Inner 1/4T Code complete is that percent of the critical inner 1/4T wall volume which can effectively be examined using automated (A) or manual (M) ultrasonic examination techniques.
- 5) (Note 5 was deleted because all information is actual and not anticipated.)
- 6) The total number of nozzles in revision 1 of this relief was 30. It increased to 31 because an additional component, N-10, was reclassified into this examination category B-D, Item No. 3.90. It was previously categorized incorrectly as B-E, the category for partial penetration weld nozzles. Refer to Non-Conformance Report NCR 97-02097, resolved 8/29/97.
- 7) Nozzle N-10 was inaccessible due to interferences with the bio-shield and mirror insulation.
- 8) The percent composite coverage is determined by the examiner's procedure. The procedure applies to the specific equipment utilized for the examination and complies with ASME Section XI and Section V article 4.
- 9) Thirty (30) of the 31 nozzles (Category B-D, Item No. 3.90) are included in the table. The other nozzle (N-7) was examined with greater than 90% coverage.

RELIEF REQUEST NO. RR-13 REV. 2 (CONTD)

TABLE RR-13-2

Effect of Nozzle Design Configuration on Component Inspectability¹
Examination Category B-D, Item No. B3.90

Unit 3

Nozzle Identification/Description	Actual Data Reported in Rev 1 of this relief			Added Information per Rev 2
	Type Scan (note 2)	% Code Complete (note 3)	% Inner 1/4T Code Complete (note 4)	% Composite Coverage (note 8)
N1A Recirculation Outlet	45T	6.2 (A)	27.0 (A)	
	60T	18.9 (A)	63.5 (A)	
	60P	12.4 (A)	47.6 (A)	
N1B Main Recirc Outlet	--	--	--	28.6
N2A Recirculation Inlet	45T	16.1 (A)	40.4 (A)	
	60T	30.5 (A)	70.2 (A)	
	60P	13.9 (A)	34.3 (A)	
N2B Recirculation Inlet	45T	14.9 (A)	37.4 (A)	
	60T	28.3 (A)	65.1 (A)	
	60P	12.8 (A)	31.8 (A)	
N2C Recirculation Inlet	45T	17.1 (A)	42.8 (A)	
	60T	32.3 (A)	74.3 (A)	
	60P	14.7 (A)	36.4 (A)	
N2D Recirculation Inlet	45T	16.4 (A)	41.0 (A)	
	60T	31.0 (A)	71.2 (A)	
	60P	13.9 (A)	34.3 (A)	
N2E Recirculation Inlet	45T	16.6(A)	41.6(A)	
	60T	31.4(A)	72.3(A)	
	60P	14.3(A)	35.4(A)	
N2F	45T	16.1 (A)	40.4 (A)	

RELIEF REQUEST NO. RR-13 REV. 2 (CONTD)

Unit 3

Nozzle Identification/Description	Actual Data Reported in Rev 1 of this relief			Added Information per Rev 2
	Type Scan (note 2)	% Code Complete (note 3)	% Inner 1/4T Code Complete (note 4)	% Composite Coverage (note 8)
Recirculation Inlet	60T	31.4 (A)	72.3 (A)	
	60P	14.3 (A)	35.4 (A)	
N2G Main Recirc In	--	--	--	26.36
N2H Recirculation Inlet	45T	16.8 (A)	42.2 (A)	
	60T	31.9 (A)	73.3 (A)	
	60P	14.3 (A)	35.4 (A)	
N2J Main Recirc In	--	--	--	26.36
N2K Main Recirc In	--	--	--	26.36
N3A Main Steam	45T	9.8 (A)	38.1 (A)	
	60T	24.3 (A)	76.4 (A)	
	60P	11.4 (A)	45.0 (A)	
N3B Main Steam	--	--	--	30.23
N3C Main Steam	--	--	--	30.23
N3D Main Steam	45T	9.4 (A)	36.6 (A)	
	60T	23.4 (A)	73.4 (A)	
	60P	11.0 (A)	43.4 (A)	
N4A Feedwater	--	--	--	18.1
N4B Feedwater	--	--	--	23.2
N4C Feedwater	--	--	--	15.3
N4D Feedwater	--	--	--	24.1

RELIEF REQUEST NO. RR-13 REV. 2 (CONTD)

Unit 3

Nozzle Identification/Description	Actual Data Reported in Rev 1 of this relief			Added Information per Rev 2
	Type Scan (note 2)	% Code Complete (note 3)	% Inner 1/4T Code Complete (note 4)	% Composite Coverage (note 8)
N4E Feedwater	--	--	--	11.2
N4F Feedwater	--	--	--	18.1
N5A Core Spray	45T	19.9 (A)	44.0 (A)	
	60T	31.3 (A)	65.4 (A)	
	60P	15.1 (A)	35.6 (A)	
N5B Core Spray	45T	20.2 (A)	44.7 (A)	
	60T	31.8 (A)	66.4 (A)	
	60P	15.3 (A)	36.2 (A)	
N6A CH-NA Nozzle				38.8
N6B CH-NC Nozzle				37.5
N7 CH-NB Nozzle				48.62
N8A Jet Pump Instrumentation	45T	91.8 (M)	100.0 (M)	
	60T	92.5 (M)	100.0 (M)	
	45P	77.3 (M)	80.7 (M)	
	60P	77.3(M)	80.7(M)	
N8B Jet Pump Instrumentation	--	--	--	76.7
N9 Control Rod Drive Nozzle	--	--	--	33.1
N10 SBLC Nozzle	--	--	--	43.3

RELIEF REQUEST NO. RR-13 REV. 2 (CONTD)

Footnotes for Table RR 13-2:

- 1) Component inspectability based on actual examination results.
- 2) Unless indicated, a 45 degree parallel scan is not practical due to weld configuration.
- 3) % Code complete is that percent of the ASME Code required examination volume which can effectively be examined using automated (A) or manual (M) ultrasonic examination techniques.
- 4) % Inner 1/4T Code complete is that percent of the critical inner 1/4T wall volume which can effectively be examined using automated (A) or manual (M) ultrasonic examination techniques.
- 5) (Note 5 was deleted because all information is actual and not anticipated.)
- 6) The total number of nozzles in this category was 30. It increased to 31 because an additional component, N-10, was reclassified into this examination category B-D, Item No. 3.90. It was previously categorized incorrectly as B-E, the category for partial penetration weld nozzles. Refer to Non-Conformance Report NCR 97-02097, resolved 8/29/97.
- 7) The percent composite coverage is determined by the examiner's procedure. The procedure applies to the specific equipment utilized for the examination and complies with ASME Section XI and Section V article 4.
- 8) All of the 31 nozzles (Category B-D, Item No. 3.90) are included in the table.

REQUEST NUMBER: RR-24
REVISION 0

COMPONENT IDENTIFICATION

Code Class: 1
References: IWB-2500,
Table IWB-2500-1
Examination Category: B-D
Item Number: B3.100
Description: Examination of Standby Liquid Control Nozzle Inside Radius
Section
Component Numbers: Unit 2: N10-IRS
Unit 3: N10-IRS

CODE REQUIREMENT

Table IWB-2500-1, Examination Category B-D, Code Item No. B3.100, requires a volumetric examination to be performed on the inner radius section of all reactor vessel nozzles each inspection interval. Table IWB-2500-1, Examination Category B-D, Code Item No. B3.100 refers to the nozzle configurations shown in Figure No. IWB-2500-7.

BASIS FOR RELIEF

Pursuant to 10CFR50.55a(g)(5), relief is requested on the basis that conformance with the Code requirements is impractical for the facility.

The Standby Liquid Control (SLC) nozzle, as shown in Figure RR-24-1, is designed with an integral socket to which the boron injection piping is fillet welded. This design is different from the configurations shown in ASME, Section XI, Figure No. IWB-2500-7. The SLC nozzle is located in the bottom head of the vessel in an area that is inaccessible for ultrasonic examinations from the inside of the vessel. Therefore, ultrasonic examinations can only be performed from the outside diameter of the vessel. As shown in Figure RR-24-1, the ultrasonic scan would need to travel through the full thickness of the vessel into a complex cladding/socket configuration. These geometric and material reflectors inherent in the design prevent a meaningful examination from being performed on the inner radius of the SLC nozzle.

REQUEST NUMBER: RR-24
REVISION 0

BASIS FOR RELIEF (con't)

In addition, the inner radius socket attaches to piping that injects boron at locations far removed from the nozzle. Therefore, the SLC nozzle inner radius is not subjected to turbulent mixing conditions that are a concern at other nozzles.

ALTERNATIVE EXAMINATION

As an alternative examination, Peach Bottom Atomic Power Station, Units 2 and 3, had performed a VT-2 visual examination of the subject nozzles each refueling outage in conjunction with the Class 1 System Leakage Tests performed each refueling outage.

APPLICABLE TIME PERIOD

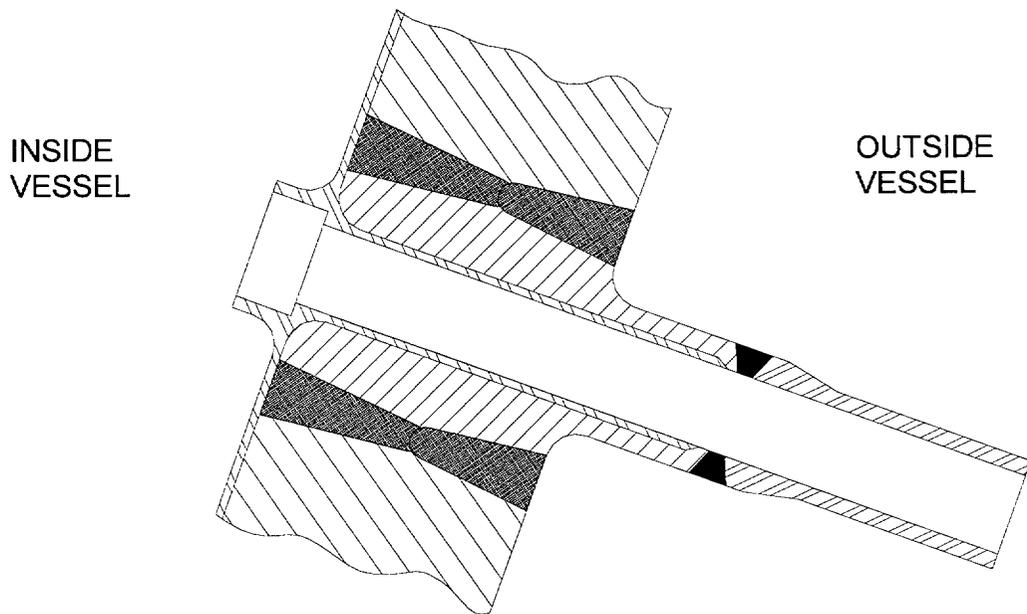
Relief is requested for the second ten-year interval of the Peach Bottom Atomic Power Station Inservice Inspection Program.

Unit 2: September 19, 1986 to November 4, 1998.

Unit 3: December 23, 1985 to August 14, 1998.

FIGURE RR-24-1

2 INCH STANDBY LIQUID CONTROL NOZZLE



REQUEST NUMBER: RR-34
REVISION 0

COMPONENT IDENTIFICATION

Code Class: 1
References: IWB-2500,
Table IWB-2500-1
Figure IWB-2500-4
Examination Category: B-A
Item Number: B1.30
Description: Examination of RPV Shell-to-Flange Weld
Component Numbers: Unit 2: C-6
Unit 3: C-6

CODE REQUIREMENT

Table IWB-2500-1, Examination Category B-A, Code Item No. B1.30, requires a volumetric examination to be performed on the Reactor Pressure Vessel shell-to-flange weld each inspection interval. Table IWB-2500-1, note 5 allows deferral of the examination from the shell surface to the end of the interval if partial examinations are performed from the flange face.

BASIS FOR RELIEF

Pursuant to 10CFR50.55a(g)(5), relief is requested on the basis that conformance with the Code requirements is impractical for the facility.

A volumetric examination from the flange face was performed for 100% of the circumference during the second interval for PBAPS, Units 2 and 3. No rejectable indications found. Additionally, an examination of the weld was performed from the inner diameter as part of the reactor pressure vessel examinations. However, less than 100% coverage was achieved due to interferences with permanent plant equipment and temporary equipment required for the refueling mode.

The actual coverage is described below:

Unit	% coverage from flange	% coverage from shell (ID)	Actual Composite coverage.	Required Composite Coverage
2	100%	75%	85%	90%
3	100%	69%	82%	90%

The percent composite coverage is determined by the examiner's procedure. The procedure applies to the specific equipment utilized for the examination and complies with ASME Section XI and Section V

Similar exams were performed in the first interval and no rejectable indications were found.

As shown above, the composite coverage is 5% less than the required code coverage for PBAPS Unit 2, and 8% less than the required coverage for PBAPS Unit 3. Therefore, the percent coverage is sufficient representation of the code-required volume.

ALTERNATIVE EXAMINATION

Volumetric examinations were performed to the maximum extent practical.

The welds are in the scope of VT-2 visual examinations performed each refueling outage in conjunction with the Class 1 System Leakage Test.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Peach Bottom Atomic Power Station Inservice Inspection Program.

Unit 2: September 19, 1986 to November 4, 1998.

Unit 3: December 23, 1985 to August 14, 1998.

REQUEST NUMBER: RR - 35
REVISION 0

COMPONENT IDENTIFICATION

Code Class: Class 3
References: IWA-5211(d), IWD-5210 *also Unit 3*
Examination Categories: D-B
Item Numbers: D2.10
Description: PBAPS Common Emergency Cooling Water System -
Pressure Retaining Components

CODE REQUIREMENTS:

Table IWD-2500-1 requires a system hydrostatic test (IWD-5223) and VT-2 examination of the pressure retaining components (Item D2.10) each inspection interval.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED:

Code requirement has been satisfied for the Emergency Cooling Water System Pressure Retaining Components for the second interval, however, the test was performed 47 days after the end of the interval.

BASIS FOR ALTERNATIVE:

This relief request is being submitted in accordance with 10CFR50.55a(a)(3)(i) and demonstrates that the proposed alternative provides an acceptable level of quality and safety.

The VT-2 examinations and flow verification required to satisfy the ASME Section XI hydrotest requirements for the Emergency Cooling Water (ECW) system for the second interval for PBAPS Unit 2 and common systems were performed in conjunction with ESW Booster and ECW system pump and valve functional test on December 22, 1998, after the end of the second interval. The second interval for PBAPS Unit 2 and common systems ended on November 4, 1998. The interval end date had been extended to include the maximum allowable interval extension per Code paragraph IWA-2400 (c).

The hydrotest was scheduled to be performed within the interval, however, river temperatures precluded the performance of the test as planned on two occasions.

In accordance with IWB-2412, the inservice tests were scheduled and performed satisfactorily in the first and second periods of the second interval.

First Period Test (3/8/85)	July 15, 1988
Second Period Test (4/8/94)	June 6, 1994
Third Period Test (per this relief request) (3/8/88)	December 22, 1998

The second interval began on September 19, 1986. Unit 2 was shutdown for an extended outage in March of 1987. The first inservice test was performed during this shutdown satisfactorily and was within the first period of the interval. Following the restart in May of 1989, the second inservice test was performed in 1994 satisfactorily and was within the second period of the interval. The hydrotest was originally scheduled "at or near the end of the second interval" in accordance with Table IWD-2500-1, Examination Category D-B, Note 2. Although the pressure test (hydrotest) was completed 47 days after the end of the interval, an acceptable level of safety was achieved for the following reasons:

- (Nov. 4, 1998)
- 1) The three required tests were all performed satisfactorily.
 - 2) The time span between the 6/6/94 test and the 12/22/98 test is 4.5 years. The allowable time between tests is 7 years. This is for the case where the test is performed early in a period, followed by a test performed late in the subsequent period.

The ESW Booster and ECW Pump and Valve Functional Inservice Test, ST-O-033-310-2, has two pre-requisites that affect the scheduling of this test. The first requires that the circulating water discharge canal cross-tie sluice gate is installed. Historically, the cross-tie gate is installed from mid-March to mid-December. Second, the river water temperature has to be less than or equal to 50 degrees F. Historically, river temperature is less than 50 degrees F from approximately mid-November to the end of March. These two prerequisites force the test to be performed in either of the following two periods: a two-week period in March and a four-week period from Mid-November to mid-December.

The basis for this 50 degree F prerequisite is based on an evaluation that was performed to determine the maximum river water temperature that would allow the ESW system to remain operable with the MO-0-33-0498 valve closed. (The MO-0-33-0498 valve is the discharge valve to the river. Closing this valve transitions the system into closed loop operation). The safety evaluation sets the upper limit at 53 degrees F. The 50 degree value was included in the test to provide margin (3 degrees F). The 53 degree limit is based on maintaining ESW system operability with the MO-0-33-0498 valve closed, a single ESW pump running, and the ESW Booster pumps not available. This portion of the ESW system is a common, cooling water system which provides heat removal for safety-related equipment on both units 2 and 3.

The test (ST-O-033-310-2) closes the MO-0-33-0498 valve. To maintain ESW operability, the evaluation requires that river water temperature must be less than or equal to 53 degrees F when this valve is closed. ESW operability is required by Technical Specification 3.7.2.

The end of the second interval for Unit 2 and common systems was November 4, 1998. In accordance with historical data, the test had been scheduled for March 30, 1998. The cross-tie gate was installed March 5, 1998, allowing the first prerequisite for the test to be met. However, two days prior to the scheduled test date an unusually warm weather pattern occurred which raised river water temperature to 56 degrees F. The river temperature remained greater than 50 degrees F throughout the summer. The test was rescheduled for November 2, 1998. However, on November 2, 1998 the river water temperature was 57 degrees F, which exceeded the prerequisite for 50 degrees F. The test was rescheduled for December 22, 1998. The test was satisfactorily performed on December 22, 1998, when actual river water temperature was 50 degrees F.

ALTERNATE REQUIREMENTS:

Perform the test per all code requirements, except the schedule requirement.

APPLICABLE TIME PERIOD:

This is a one time request for the second interval hydrotest of the Emergency Cooling Water System Pressure Retaining Components. The interval began September 19, 1986 and ended November 4, 1998. The end date of the interval includes the maximum extension allowed by the ASME Section XI Code.

REQUEST NUMBER: RR - 36
REVISION 0

COMPONENT IDENTIFICATION

Code Class: 3
References: IWF-1000
Table IWF-2500-1
Examination Category: F-B
Item Number: F2.10, F2.20, F2.30, and F2.40
Description: Linear type pipe supports
Component Numbers: Unit 2 High Pressure Service Water
32GB-H78 and 32GB-S47A

Unit 2 Emergency Service Water
33HB-S141 and 32HB-S142

Unit 3 Emergency Service Water
33HB-S146 and 33HB-S147

CODE REQUIREMENT

Examination Category F-B, Item Numbers F2.10, F2.20, F2.30, and F2.40, require a VT-3 examination to be performed each inspection interval.

BASIS FOR RELIEF

Pursuant to 10CFR50.55a(g)(5), relief is requested on the basis that performance of the code requirement is impractical for the facility.

These hangers are not accessible during plant operation and are only made accessible if the pump bays are de-watered. The Unit 3 HPSW pump bay was dewatered in 1987. At that time, all of the HPSW hangers in the bay were inspected satisfactorily. This inspection included Unit 3 HPSW supports on both the A and B pipe loops (four supports), even though only one loop required the examination during the interval. The Unit 2 bay was not dewatered.

The alternative examination described below performs examinations on greater than 50% of the supports in this F-B code category (The High Pressure Service Water System consists of two loops. The Emergency Service Water System consists of one loop).

The requirements of the third interval are the subject of a separate, third interval relief request, which proposes performing the examinations in accordance with code case N-491-1. The scope of those examinations for this same code category is 10 %.

The actual examinations performed for the second interval greatly exceed the numbers proposed for examination in the third interval.

ALTERNATIVE EXAMINATION

Perform the required VT-3 examinations on the accessible, non-exempt Class 3 hangers on the selected loops in each unit.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Peach Bottom Atomic Power Station Inservice Inspection Program.

Unit 2: September 19, 1986 to November 4, 1998.

Unit 3: December 23, 1985 to August 14, 1998.

REQUEST NUMBER: RR -37
REVISION 0

COMPONENT IDENTIFICATION

Code Class: 3
References: IWF-1000
Table IWF-2500-1
Examination Category: F-B
Item Number: F2.30
Description: Linear type pipe supports
Component Numbers: Unit 2
32GB-H17
32GB-H19
32GB-H21

Unit 3
32GB-S14
32GB-S16
32GB-S18

CODE REQUIREMENT

Examination Category F-B, Item Number F2.20 requires a VT-3 examination to be performed each inspection interval.

BASIS FOR RELIEF

Pursuant to 10CFR50.55a(g)(5), relief is requested on the basis that Performance of the code requirement is impractical for the facility. Access is restricted by permanent plant components.

Each set of the three supports per unit are guides which are in series, adjacent to themselves on a straight, horizontal run of pipe. A limited exam was able to be performed on 32GB-S18 during the second period. The examination found no rejectable conditions. These supports consist of integral attachments only.

The low temperature service of the system and similar design of the examined guides provides assurance that the examined guides have not experienced any service-induced failures.

The alternative examination described below is, essentially a 100% examination of the supports in the loop, which equates to a 50% overall examination (there are two loops in the High Pressure Service Water System in each of Peach Bottom Units 2 and 3). The requirements of the third interval are the subject of a separate, third interval relief request, which proposes performing the examinations in accordance with code case N-491-1. The scope of those examinations for this code category is 10%. The actual examinations performed for the second interval greatly exceed the numbers proposed for examination in the third interval.

ALTERNATIVE EXAMINATION

Perform the required VT-3 examinations on all other, accessible Class 3 supports on the selected loops in each unit.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Peach Bottom Atomic Power Station Inservice Inspection Program.

Unit 2: September 19, 1986 to November 4, 1998.

Unit 3: December 23, 1985 to August 14, 1998.

REQUEST NUMBER: RR - 38
REVISION 0

COMPONENT IDENTIFICATION

Code Class: 3
References: IWF-1000
Table IWF-2500-1
Examination Category: F-A
Item Number: F1.30
Description: Plate and shell type pipe supports
Component Numbers: Unit 2
33HB-S129
33HB-S159

Unit 3
33HB-S149A

CODE REQUIREMENT

Examination Category F-A, Item Number F1.30 requires a VT-3 examination to be performed each inspection interval.

BASIS FOR RELIEF

Pursuant to 10CFR50.55a(g)(5), relief is requested on the basis that performance of the code requirement is impractical for the facility. Access is restricted by permanent plant components.

The second interval requirement for examination of Emergency Service Water System non-exempt supports is to examine essentially 100% of the supports. Over 300 supports in Examination Category F-A were examined. The three supports described above were not examined due to restrictions with permanent plant components.

The examination requirements for the third interval are the subject of a separate, third interval relief request, which proposes performing the examinations in accordance with Code Case N-491-1. The scope of those examinations for this same code category is 10%.

The actual examinations performed for the second interval greatly exceed the numbers proposed for examination in the third interval.

ALTERNATIVE EXAMINATION

Perform the required VT-3 examinations on all accessible, selected Class 3 supports.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Peach Bottom Atomic Power Station Inservice Inspection Program.

Unit 2: September 19, 1986 to November 4, 1998.

Unit 3: December 23, 1985 to August 14, 1998.

REQUEST NUMBER: RR -39
REVISION 0

COMPONENT IDENTIFICATION

Code Class: 3
References: IWD-1000
Table IWD-2500-1
Examination Category: D-B
Item Number: D2.20
Description: Integral Attachment
Component Numbers: Integral attachments at these components:
Unit 2
32GB-H17
32GB-H19
32GB-H21
33HB-S129
33HB-S159

Unit 3
32GB-S14
32GB-S16
32GB-S18
33HB-S149A

CODE REQUIREMENT

Examination Category D-B, Item Number D2.20 requires a VT-3 examination to be performed each inspection interval.

BASIS FOR RELIEF

Pursuant to 10CFR50.55a(g)(5), relief is requested on the basis that performance of the code requirement is impractical for the facility. Access is restricted by permanent plant components.

The actual examination scope of integral attachments in class 3 lines is extensive when compared to the examination scope described in the third interval program. (The third interval program is based on Code Case N-509, pending regulatory approval.)

The second interval examinations are, essentially 100% of the integral attachments for non-exempt, selected hangers. This equates to approximately 50% overall examination for the HPSW system (due to the redundancy of two loops), and 100% of the ESW system. The planned, third interval scope is 10%. (The third interval examination is a VT-1 examination, which is more rigorous than the second interval VT-1 examination.)

The actual examination scope for the second interval greatly exceeds the scope proposed for examination in the third interval. The code reduction in examination scope is based on the relatively low safety implications and reliable, historical performance of integral attachments, especially for class 3 components. The actual examination history at Peach Bottom supports the code action to reduce the scope of supports requiring examination.

ALTERNATIVE EXAMINATION

Perform the required VT-3 examinations on all other, accessible, non-exempt, selected Class 3 integral attachments.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Peach Bottom Atomic Power Station Inservice Inspection Program.

Unit 2: September 19, 1986 to November 4, 1998.

Unit 3: December 23, 1985 to August 14, 1998.