

July 6, 2001

Mr. Oliver D. Kingsley, President  
Exelon Nuclear  
Exelon Generation Company, LLC  
200 Exelon Way, KSA 3-E  
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SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNIT 3 - REQUEST FOR  
ADDITIONAL INFORMATION REGARDING REQUEST FOR EXTENSION OF  
THE CONTAINMENT INTEGRATED LEAK RATE TEST

Dear Mr. Kingsley:

By letter dated May 30, 2001, Exelon Generation Company, LLC, submitted a request for a license amendment to allow a one-time extension of the interval for the containment integrated leak rate test. In order to continue our review of your request, additional information, as delineated in the enclosure, is required. The request for additional information was discussed with your staff on July 2, 2001, and a response date of August 3, 2001, was mutually agreeable.

Sincerely,

*/RA/*

John P. Boska, Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-278

Enclosure: As stated

cc w/encl: See next page

Peach Bottom Atomic Power Station,  
Units 2 and 3

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Peach Bottom Atomic Power Station,  
Units 2 and 3

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**REQUEST FOR ADDITIONAL INFORMATION**  
**PEACH BOTTOM ATOMIC POWER STATION (PBAPS), UNIT 3**  
**ONE TIME DEFERRAL OF INTEGRATED CONTAINMENT LEAK RATE TESTING**

Reference: Letter from Exelon Generation Company, LLC to the U.S. Nuclear Regulatory Commission (NRC), "Peach Bottom Atomic Power Station, Unit 3, License Amendment Request 01-00430, May 30, 2001.

As the inservice inspection requirements mandated by 10 CFR 50.55a and the leak rate testing requirements of Option B of Appendix J complement each other in ensuring the leak-tight and structural integrity of the containment, the NRC staff needs the following information to complete its review of the license amendment request.

1. On page 5 of the "Supporting Information," attached to the letter, you state, "Primary Containment Pressure is continuously indicated and periodically monitored from the Main Control Room." In the discussion during the meeting of June 21, 2001, with the staff, you indicated that this pressure is maintained at a slightly higher pressure than the pressure in the surrounding Secondary Containment. Please provide information related to the maintenance of this positive pressure, such as, the average positive pressure maintained, how often it is monitored, and corrective actions you plan to take if the positive pressure is not maintained due to a small, continuous leakage from the primary containment.
2. Based on the description of the containment inspection on page 8 of the "Supporting Information," the staff understands that you are using the 1992 Edition and the 1992 Addenda of Subsection IWE of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI (Code). IWE-1240 requires you to identify the surface areas requiring augmented examinations. Please provide the locations of the drywell and the torus of the PBAPS, Unit 3, which you have identified as requiring augmented examination, and a summary of findings of the examinations performed.
3. For the examination of seals and gaskets, and examination and testing of bolts associated with the primary containment pressure boundary (Examination Categories E-D and E-G), you had requested and have been authorized to use an alternative to these Code requirements. As an alternative, you plan to examine these components during the leak rate testing of the primary containment. With the flexibility provided in Option B of Appendix J for Type B and Type C testing (as per Nuclear Energy Institute (NEI) report NEI 94-01 and Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program", September 1995), and the extension requested in this amendment for Type A testing, please provide the schedule for the examination and testing of seals, gaskets, and bolts that provides assurance of the integrity of the containment pressure boundary.
4. The stainless steel bellows have been found to be susceptible to trans-granular stress corrosion cracking, and the leakages through them are not readily detectable by Type B testing (see NRC Information Notice 92-20, "Inadequate Local Leak rate Testing"). In general, boiling water reactor Mark I primary containments have bellows on the vent lines between the drywell and the torus, as well as on several process piping penetrations in the drywell. If degraded, the bellows could allow the drywell steam and air to bypass the suppression pool during loss-of-coolant accidents and core damage

accidents. Please provide information regarding inspection and testing of the bellows at PBAPS, Unit 3, and how such behavior has been factored into the risk assessment.

5. Inspections of some of the Mark I containments have indicated degradation from the uninspectable side of the drywell steel shell and steel liner of the primary containments. These degradations cannot be detected unless they are through the thickness of the shell or liner, or the uninspectable side of the surfaces are periodically examined by ultrasonic testing. Please provide information as to how the potential leakages under high pressures during the core damage accidents are factored into the risk assessment related to the extension of the integrated leak rate test.