

August 13, 2001

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

Subject: Peach Bottom Atomic Power Station, Unit 3
Facility Operating License No. DPR-56
NRC Docket No. 50-278
License Amendment Request (LAR) 01-00430

- References:
- 1) Letter from J. A. Hutton (Exelon Generation Company, LLC) to U. S. Nuclear Regulatory Commission (NRC), dated May 30, 2001
 - 2) Letter from J. A. Hutton (Exelon Generation Company, LLC) to U. S. Nuclear Regulatory Commission (NRC), dated May 30, 2001
 - 3) Letter from J. P. Boska (NRC) to J. A. Hutton (Exelon Generation Company, LLC), dated July 6, 2001
 - 4) Letter from J. A. Hutton (Exelon Generation Company, LLC) to U. S. Nuclear Regulatory Commission (NRC), dated July 24, 2001

Dear Sir/Madam:

In a letter dated May 30, 2001, Exelon Generation Company, LLC, submitted License Amendment Request 01-00430, in accordance with 10 CFR 50.90, requesting an amendment to the Technical Specifications (Appendix A) of Operating License No. DPR-56, for Peach Bottom Atomic Power Station (PBAPS), Unit 3. This proposed change revises Technical Specifications (TS) Section 5.5.12 ("Primary Containment Leakage Rate Testing Program") to reflect a one-time deferral of the Type A Containment Integrated Leak Rate Test (ILRT). In response to a telephone conversation between U. S. Nuclear Regulatory Commission staff and Exelon Generation Company, LLC, on August 7, 2001, attached is additional clarification to our Reference 4 response.

If you have any questions, please do not hesitate to contact us.

Very truly yours,



Michael P. Gallagher
Director - Licensing

Enclosures: Affidavit, Attachment

cc: H. J. Miller, Administrator, Region I, USNRC
A. C. McMurtry, USNRC Senior Resident Inspector, PBAPS
R. R. Janati, Commonwealth of Pennsylvania

A001

COMMONWEALTH OF PENNSYLVANIA:

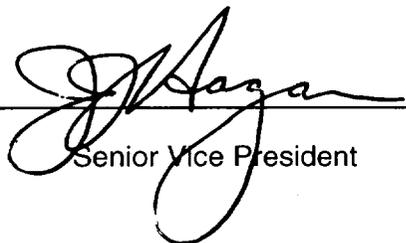
: ss.

COUNTY OF CHESTER

:

J. J. Hagan, being first duly sworn, deposes and says:

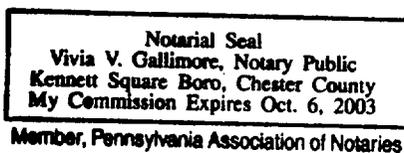
That he is Senior Vice President of Exelon Generation Company, LLC, the Applicant herein; that he has read the attached information concerning License Amendment Request 01-00430 involving a one-time deferral of the integrated leak rate test for Peach Bottom Facility Operating License DPR-56, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.


Senior Vice President

Subscribed and sworn to
before me this 13th day
of August 2001.



Notary Public



ADDITIONAL INFORMATION
PEACH BOTTOM ATOMIC POWER STATION, UNIT 3
ONE-TIME DEFERRAL OF INTEGRATED LEAK RATE TESTING

The following is additional information that supplements our July 24, 2001 response to Question 5, concerning a Mark I containment which had identified degradation on the uninspectable side of the drywell steel shell of the primary containment. As stated in our response, degradation of the outer surface was identified at another Mark I containment. The cause of this degradation was determined to be from water entering the drywell air gap region, and becoming trapped in the sand cushion region at the base of the air gap. The air gap region surrounds the outside surface of the drywell and extends from the sand cushion region at the bottom, to just below the drywell bellows region at the top. During refueling activities, a potential leakage path could exist through the drywell bellows region, as experienced on the reported Mark I containment. The drywell bellows provides a flexible seal between the drywell and the reactor cavity. The drywell to concrete seal drains are also located in this bellows area. Leakage of these components could allow water to enter the air gap region. However, such water intrusion is not considered credible at PBAPS, in that any leakage through the drywell bellows is normally channeled to seal rupture collection pipes and is alarmed in the main control room.

The PBAPS, Units 2 and 3 design incorporates an 8" pipe to divert potential drywell bellows leakage to a waste collection tank. This 8" drain line is fed by four, 4" seal rupture drains equally spaced around the reactor cavity. A flow of ten gallons per minute through the 8" drain line will result in an annunciator alarm on the refueling floor panel and also will result in an alarm in the main control room. Functionality of the alarm and flow switch is verified periodically. Further, unlike the design at the Mark I containment that reported leakage, the PBAPS reactor cavity seal drain line design incorporates full penetration welds, instead of bolted connections. Additionally, the PBAPS design incorporates a weir wall which prevents drywell bellows leakage from entering the drywell air gap before being drained away by the seal rupture drains.

The PBAPS design also prevents inleakage to the sand cushion by use of a sheet metal cover which is sealed to the drywell shell. This sealed cover separates the sand cushion from the air gap region. Located above the sealed cover plate are an additional four, 4" air gap drains that drain any inleakage away from the sealed cover plate.

This rigorous design, along with the monitoring and testing measures described, provide substantial defense against water entering the drywell air gap region. With no water intrusion, potential degradation on the outside surface of the drywell is prevented.

Additionally, as part of the PBAPS Primary Containment Inservice Inspection Program, several examinations and tests of components associated with the drywell air gap region confirm that abnormal conditions which could lead to containment degradation do not exist. These examinations and tests are discussed below.

ADDITIONAL INFORMATION
PEACH BOTTOM ATOMIC POWER STATION, UNIT 3
ONE-TIME DEFERRAL OF INTEGRATED LEAK RATE TESTING

The following examinations are performed on the four drywell air gap drain lines:

1. A functional test (i.e., smoke test) is performed on the four drywell air gap drains once every 10 year interval to verify that the drywell air gap drain lines are unclogged and functional. The test also verifies that the drain lines are free of water.
2. A visual examination is performed on the drywell air gap drain lines once each period when the refueling cavity is flooded to look for signs of leakage.

The above described examinations and tests were last performed on PBAPS, Unit 3 during the 1999 refueling outage (3R12). Results were acceptable.

Additionally, when stabilizer access hatches (penetrations N-110A through N-110H) are opened to perform the Examination Category E-A examinations on the weld to the shear lugs attached to the exterior of the drywell shell at elevation 194 ft. 8 in., a VT-3 visual examination is performed on the following items:

1. The drywell exterior stabilizer support.
2. The accessible exterior surface of the drywell to look for evidence of degradation or leakage.
3. The accessible drywell air gap to look for items that could trap water in the unlikely event of leakage through the refueling bellows.

To date, two (2) stabilizer access hatches have been opened on each of the PBAPS containment vessels, and the above described examinations have been performed. The results of these examinations confirmed that no evidence of moisture or degradation exists.