

September 20, 2002

LICENSEE : Exelon Corporation

FACILITIES: Peach Bottom, Units 2 and 3

SUBJECT: TELECOMMUNICATIONS WITH EXELON CORPORATION TO DISCUSS
RESPONSES TO A REQUEST FOR ADDITIONAL INFORMATION
PERTAINING TO SECTIONS B1, B2, AND 2.4.16 OF THE PEACH BOTTOM,
UNITS 2 AND 3, LICENSE RENEWAL APPLICATION

On March 6, 2002, the NRC staff (hereafter referred to as "the staff") issued a request for additional information (RAI) pertaining to aging management activities of the license renewal application (LRA). Exelon Corporation (hereafter referred to as "the applicant") responded to this request by letter, dated May 14, 2002. The staff needed clarification to the applicant's responses on LRA Sections B1, B2, and 2.4.16. On August 6 and 8, 2002, conference calls were conducted between the staff and the applicant. A list of participants of the conference calls are provided in Enclosures 1 and 2.

On August 6, 2002, the staff requested the applicant expand upon their RAI response for LRA Section B.1.3 in two areas of the LRA. Section B.1.3 pertains to the closed cooling water chemistry program. The staff requested clarification on planned monitoring and inspection activities. The applicant responded that the monitoring and inspection activity is part of an existing program, rather than a planned program, based on water chemistry guidance contained in EPRI Report 107396. The staff also requested specific concentrations for the acceptance criteria parameters, including chloride and sulfate. The applicant responded that the acceptance criteria is below 10 parts per million for both chloride and fluoride and, typically, measurements are below 1 part per million. There is no limit for sulfate and the data trend is monitored.

The second RAI, regarding LRA Section B.2.12, pertains to the heat exchanger inspection activities. The staff requested clarification on the applicant's response for the inspection procedures used to determine acceptability of the heat exchanger tubes. The applicant responded that the high pressure coolant injector (HPCI) gland seal condenser, HPCI turbine lube oil cooler, and reactor cone isolation cooling (RCIC) lube oil cooler are very small heat exchangers; all tubes are fully disassembled, thoroughly cleaned, and visually inspected. No boroscope is used in the procedure. The inspection procedures were included in a subsequent e-mail, which is provided in Enclosure 3.

On August 8, 2002, the staff requested clarification on LRA Section 2.4.16 to determine if supports for cable trays and conduits are within the scope of the license renewal. The applicant responded that the relevant information is contained in LRA Section 2.4.13 on the support system.

Regarding Section B.2.5, the staff asked the applicant to explain the frequency of inspections. The applicant responded that emergency cooling water (ECW) pumps are inspected every 10 years and the refueling water storage tanks (RWST) are inspected every 4 years. The staff also asked about LRA Section B.3.4, as to when the one-time inspection of piping would be performed. The applicant responded that the inspection would occur before the end of the plant life, between years 30 and 40.

The staff finds that three items may potentially become confirmatory items in the safety evaluation report for the Peach Bottom Atomic Power Station LRA: 1) numerical limits and actual measurements of the water chemistry; 2) inspection of HPCI gland seal condenser, HPCI turbine lube oil cooler, and RCIC lube oil cooler heat exchanger tubes; and 3) frequency of inspections of the ECW pumps and RWST. If any of these items become confirmatory, the applicant will need to submit a written response to confirm this information.

A draft of this telecommunication summary was provided to the applicant to allow them the opportunity to comment prior to the summary being issued. The applicant provided comments to specify the heat exchangers discussed in Section B2.12.

/RA/

William L. Dam, Geochemist
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-277 and 50-278

Enclosures: As stated

cc w/enclosures: See next page

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/RA/

William L. Dam, Geochemist
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-277 and 50-278

Enclosures: As stated

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DATE	09/19/02	09/19/02	09/19/02	9/20/02

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TELECOMMUNICATION PARTICIPANTS
August 6, 2002

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Meena Khanna

Exelon Corporation Participants

Jerry Phillabaum

Kevin Muggleston

Enclosure 1

TELECOMMUNICATION PARTICIPANTS
August 8, 2002

Staff Participants

William Dam

Jack Cushing

Gregory Hatchett

Meena Khanna

Exelon Corporation Participants

Jerry Phillabaum

Kevin Muggleston

Amid Ouaou

From: "Phillabaum, Jerry L." <jerry.phillabaum@exeloncorp.com>
To: "wld@nrc.gov" <wld@nrc.gov>
Date: 8/6/02 11:24AM
Subject: FW: Procedures Relied Upon to Implement B.2.12 Activities

Please pass to Meena.

-----Original Message-----

From: Muggleston, Kevin P.
Sent: Monday, August 05, 2002 4:16 PM
To: Phillabaum, Jerry L.
Subject: RE: Request for telecon regarding Peach Bottom license review

Jerry,

The following procedures are all that are applicable to the heat Exchanger Inspection Activity:

PMT 251038
PMT 251499
M-C-750-003
PMT 324804
PMT 377840
M-C-756-006

Our approach is to disassemble and inspect for degradation, and if there is no degradation then there is no flow blockage and no loss of heat transfer. Note that this is an acceptable approach under the rules of GL 89-13.

-----Original Message-----

From: Phillabaum, Jerry L.
Sent: Monday, August 05, 2002 3:35 PM
To: Muggleston, Kevin P.
Subject: FW: Request for telecon regarding Peach Bottom license review
Importance: High

-----Original Message-----

From: William L Dam [mailto:WLD@nrc.gov]
Sent: Monday, August 05, 2002 3:19 PM
To: jerry.phillabaum@exeloncorp.com
Cc: David Solorio; Meena Khanna; Raj Anand; Stephanie Coffin; Samson Lee
Subject: RE: Request for telecon regarding Peach Bottom license review

Mr. Philliabaum:

Enclosure 3

As we discussed on the phone, we plan to call you and your technical expert at 10am Tuesday 8/6.

Here are the questions that we will discuss:

B.1.3 Closed Cooling Water Chemistry Program

For the monitoring and trending parameter, have you committed to a date/schedule to begin the monitoring and inspection activities for the closed cooling water chemistry AMP? If so, what is your planned date to begin this activity?

For the acceptance criteria parameter, you indicated the specific levels for concentration of the ph, nitrite, and TTA. Do you have specific quantitative levels for the chlorides, sultates, etc? If so, pls. provide those levels.

B.2.12 Heat Exchanger Inspection Activities

For the program scope parameter, please indicate the number of tubes inspected or percentage of tubes inspected.

For the detection of aging effects parameter, how are you visually inspecting the tubes; are you using a borescope? If not, is NDE being applied-how do you verify what is going on in the tubes?

For the acceptance criteria parameter, what are the acceptance criteria for the tubine operability surviellance test? Address % flow blockage that is not acceptable, % loss of heat transfer not acceptable or level of operability.

If you have any questions, please call me at 301-415-3407.

Bill Dam
License Renewal and Environmental Impacts Program
US Nuclear Regulatory Commission
MS O12D1
Washington, DC 20555

>>> "Phillabaum, Jerry L." <jerry.phillabaum@exeloncorp.com> 08/05/02
08:17AM >>>

I hope to have an expert with me on the phone to try to answer these items on Closed Cooling Water Chemistry and on Heat Exchanger Inspection Activities. Most of my technical experts are on vacation this week. We should be available for a call after 9:30 today.

-----Original Message-----

From: William L Dam [mailto:WLD@nrc.gov]

Sent: Friday, August 02, 2002 1:38 PM

To: jerry.phillabaum@exeloncorp.com

Cc: David Solorio; Meena Khanna; Raj Anand

Subject: Request for telecon regarding Peach Bottom license review

Mr. Phillabaum:

We are interested in your availability for a phone today or Monday to discuss clarification on some remaining items. Please email me or call 301-415-3407 so I can arrange a technical discussion with Ms. Meena Khanna.

Thank you,

Bill Dam
License Renewal and Environmental Impacts Program
US Nuclear Regulatory Commission
Washington DC 20555

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