February 4, 2003

LICENSEE: Exelon Generation Company, LLC (Exelon)

FACILITY: Peach Bottom Atomic Power Station, Units 2 and 3

SUBJECT: TELECOMMUNICATION WITH EXELON CORPORATION TO DISCUSS MATTERS RELATED TO THE NRC STAFF REVIEW OF THE PEACH BOTTOM LICENSE RENEWAL APPLICATION

In preparing the final safety evaluation report (SER) on the Peach Bottom Atomic Power Station (Peach Bottom) license renewal application (LRA), the staff identified the need for additional clarification regarding a previous request for additional information (RAI) related to the aging management activities for the standby gas treatment system. On November 5, 2002, the staff held a conference call with the applicant. A list of participants is included in Enclosure 1. During the call, the staff asked two questions regarding the standby gas treatment system (SGTS), which is included in Enclosure 2. The following is a summary of the information discussed during the call.

Section 3.2.1.2.1 of the SER with open items issued September 13, 2002, (ADAMS accession number ML022590468) discusses Exelon's (the applicant's) response to RAI 3.3-7. The RAI response was provided to the NRC by letter dated May 6, 2002 (ADAMS accession number ML021480350). During the call, the staff requested the additional information, as outlined in Enclosure 2.

The applicant responded to the first question by stating that the RAI response was still applicable in light of the staff's additional questions. With regard to the SGTS, the applicant stated that the ducting is not insulated, but that the information in the RAI response related to the ambient temperature surrounding the ducting, in equilibrium with air temperature inside the ducting, was why the SBTS was not expected to experience water accumulation that could lead to initiating an aging effect. The applicant said that the ducting for the SGTS is made of galvanized steel. The applicant said that there were no aging effects expected for galvanized steel in a moist air environment and cited an EPRI report, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools," Revision 3, EPRI TR-114882, that supported their basis that there were no aging effects for the material and its environment. The applicant added that it had reviewed the Generic Aging Lessons Learned Report, NUREG-1801, and noted that it only specified aging effects for carbon steel SGTS components.

Regarding the staff's second question in Enclosure 2, the applicant stated that the aging management results in the LRA for insulation (discussed in Section 3.5.17 of the SER) concluded that there were no aging effects for insulation.

The staff requested that the applicant submit, in writing, the information provided in response to the first question during this call along with responses that the applicant would be sending in to

address SER open item 2.3.2.7.2-1. On November 26, 2002, the applicant provided this additional information with the responses to the open and confirmatory items (ADAMS accession number ML022670501, page 4 of 49 of Attachment 1).

/***RA***/

David L. Solorio, Senior Project Manager
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Office of Nuclear Reactor Regulation

Docket Nos.: 50-277 and 50-278

Enclosures: As stated

cc w/enclosures: See next page

address SER open item 2.3.2.7.2-1. On November 26, 2002, the applicant provided this additional information with the responses to the open and confirmatory items (ADAMS accession number ML022670501, page 4 of 49 of Attachment 1).

/***RA***/

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Enclosure 1

Open Item 3.2-1 to address concerns raised by Dr. Rosen on identification of aging affects for galvanized stainless steel components in the Peach Bottom SGTS.

Open Item 3.2-1 Summary: In RAI 3.3-7 the staff raised concerns regarding whether corrosion-induced aging effects such as loss of material or cracking were applicable to ESF components in sheltered air conditions. Specifically, the staff requested that Exelon ". . .confirm that the operating surface temperatures for those ESF components identified in Tables 3.2-1, 3.2-2, 3.2-3, 3.2-4, 3.2-5, 3.2-6, 3.2-7, and 3.2-8 as being exposed to sheltered air and serving a pressure boundary function are higher that the ambient temperature conditions for sheltered air conditions." In the RAI, the staff stated, ". . .if any of these components have surface temperatures that are lower that the ambient temperatures for sheltered air environments, analyze whether condensation of the surfaces of these components may lead to corrosion or aging of the components." The staff also stated, ". . .if corrosion or aging is possible, identify the applicable effects associated with such aging, and propose applicable programs and activities to manage the effects." On December 13, 2001, Exelon provided the following response to RAI 3.3-7:

> Anti-sweat insulation is installed on all piping valves and fittings that are subject to humid air with an operating temperature of 30-60°F or with an operating temperature below ambient. This ensures that moisture is not in direct contact with exposed metal and therefore corrosion is not a relevant aging effect for these components in a sheltered environment.

During the ACRS Subcommittee meeting for the Peach Bottom license renewal application, dated October 30, 2002, Dr. Rosen of the ACRS subcommittee raised a concern whether Exelon's response to RAI 3.3-7 is applicable for metal components (valve bodies, piping, tubing, fittings, sheet metal, etc.) in the standby gas treatment system (SGTS) under sheltered air and/or ventilation air environments, and whether corrosion is an applicable aging effect for these SGTS components. In his comment to the staff, Dr. Rosen stated that SGTS is idle for long periods and identified that he was concerned that condensation of water may occur in the SGTS ductwork during these idle periods.

Open Item: In regard to your aging management review of metallic SGTS components under shelter air and ventilation air conditions:

1. Assess whether or not your previous response to RAI 3.3-7 is applicable to the metallic SGTS components that are exposed to sheltered air or ventilation air environments. In your assessment of this matter, take into account whether condensation may occur in the SGTS (either internally or externally) during the periods in which it is idle, and evaluate whether your response to RAI 3.3-7 is applicable during the idle periods for SGTS. If corrosion or aging is possible in these components, identify the applicable effects associated with such aging, and propose applicable programs and activities to manage the effects. Provide a technical bases for your conclusions made in regard to this assessment.

2. Your response to RAI 3.3-7 credits anti-sweat insulation as the basis for precluding corrosion in metallic ESF components that are exposed to humid air conditions and are in the 30-60°F range or operating at a temperature below ambient. State which measures or activities are taken to ensure the integrity of the insulation over time and to ensure that age-related degradation has not occurred in the anti-sweat insulation.

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