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10CFR54 10CFR50

January 29, 2003

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

> Peach Bottom Atomic Power Station, Units 2 and 3 Facility Operating License Nos. DPR-44 and DPR-56 NRC Docket Nos. 50-277 and 50-278

- Subject: Response to Teleconference Request for Additional Clarification Related to SER Open Item 4.5.2-1 Response for Top Guide Inspection
- Reference: January 14, 2003 letter from Michael P. Gallagher (Exelon), to NRC Document Control Desk regarding Response to Request for Additional Information related to License Renewal

Dear Sir/Madam:

Reference letter, Attachment 3 provided a revised response to SER open item 4.5.2-1 on the top guide inspection activity. Subsequently, by teleconference dated January 21, 2003, the NRC requested additional clarification about the top guide inspection activity. Specifically, the NRC wanted to confirm that the sample size of 10% every 12 years with at least 5% every 6 years, will be based on locations that would see a higher fluence level.

The top guide inspection will be performed with the control rod guide tube inspection. The CR guide tube inspections were performed on Unit 2 in 2002 and on Unit 3 in 2001. Ten locations were inspected at each unit. None of the ten locations were near the periphery, which would see a lower fluence value. Eight of the ten locations were in the center or close to the center of the core, which would see a higher fluence value. The CR blades wear out and get replaced during outages, at which time the CR guide tubes are available for inspection. The primary reason for CR blades wearing out is the high neutron flux, which again would be higher for those locations not near the periphery. Request for Additional Clarification Related to SER Open Item 4.5.2-1 Response for Top Guide Inspection January 29, 2003 Page 2

In conclusion, we expect with reasonable assurance that future locations for CR guide tubes and top guide that will be inspected will also be in the higher fluence region.

If you have any questions or require additional information, please do not hesitate to call.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,

Executed on _01-30-03

Muchell Sulley

Michael P. Gallagher Director, Licensing & Regulatory Affairs Mid-Atlantic Regional Operating Group

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