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10CFR54

February 5, 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 for Clarification on List of Commitments

Reference:

- January 31, 2003 Letter from Michael P. Gallagher (Exelon), to NRC Document Control Desk Regarding Response to Request for Additional Information Related to License Renewal
- 2) Conference call between Exelon and NRC staff on February 5, 2003 regarding list of commitments

Dear Sir/Madam:

Reference letter 1 Attachment 1 transmitted a list of commitments that included future actions as identified in the Updated Final Safety Analysis Report (UFSAR) Supplement Appendix A, Attachment 2 of the Reference letter 1. Subsequently in the Reference 2 telephone call, the NRC provided comments on the commitment list and requested two additional commitments be incorporated that were included in the UFSAR Supplement.

Attachment 1 to this letter revises the list of commitments and includes these two additional commitments as line items 26 and 27. These commitments relate to RPV studs and to environmental fatigue.

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 <u>02-06-03</u>

Michael P. Gallagher

Director, Licensing & Regulatory Affairs Mid-Atlantic Regional Operating Group

Enclosures: Attachment 1

cc: H. J. Miller, Administrator, Region I, USNRC

A. C. McMurtray, USNRC Senior Resident Inspector, PBAPS

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Attachment 1

Peach Bottom Atomic Power Station Units 2 & 3

Revised License Renewal Commitment Listing

Peach Bottom Atomic Power Station Units 2 & 3 Revised License Renewal Commitment Listing

Item	Commitment	UFSAR Supplement Location	Frequency	Source
1	Evaluate any age related degradation found during recirculation system ISI inspections for applicability to the NSR portions of the recirculation system that was included in the scope of license renewal for NSR/SR.	A.1.8, ISI Program	Prior to period of extended operation.	Clarification to SER OI 2.3.3.19.2-1, letter dated January 14, 2003.
2	Notify the NRC whether Integrated Surveillance Program per BWRVIP-78 or plant specific program will be implemented	A.1.12, Reactor Materials Surveillance Program	Prior to period of extended operation	Response to RAI 3.1-15, letter dated May 6, 2002 and license condition
3	Perform Inspection of carbon steel Component Supports (Other than ASME Class 1, 2, 3, and ASME Class MC component supports)	A.1.16, Maintenance Rule Structural Monitoring Program	Prior to period of extended operation and every 4 years thereafter.	Response to RAI 3.5-2, letter dated May 21, 2002
4	Perform Inspection of SBO structural components	A.1.16, Maintenance Rule Structural Monitoring Program	Prior to period of extended operation and every 4 years thereafter.	Response to RAI 2.5-1, letter dated May 22, 2002.
5	Perform periodic reviews of calibration test results of electrical cables used in LPRM and WRM Instrumentation circuits to identify potential existence of aging degradation	A.1.17, Electrical Cables not subject to 10CFR50.49 Environmental Qualification Requirements used in Instrumentation Circuits	On-going	Response to SER Open Item 3.6.1.2.2- 1, letter dated November 26, 2002.
6	Perform inspection of outer sluice gates in the circulating water pump structure	A.2.5, Outdoor, Buried, and Submerged Component Inspection Activities	Prior to period of extended operation	Response to RAI 3.5-3, letter dated May 21, 2002.
7	Perform inspection of hazard barrier doors in a sheltered environment for loss of material	A.2.6, Door Inspection Activities	Prior to period of extended operation and every 4 years thereafter	Response to RAI 3.5-2.A, letter dated May 21, 2002 and RAI 2.6-1, letter dated April 29, 2002.
8	Perform inspection of RPV top guide	A.2.7, Reactor Pressure Vessel and Internals ISI Program	Prior to period of extended operation	Response to SER Open Item 4.5.2-1, letter dated January 14, 2003.

Peach Bottom Atomic Power Station Units 2 & 3 Revised License Renewal Commitment Listing

Item	Commitment	UFSAR Supplement Location	Frequency	Source
9	Perform ultrasonic testing to detect wall thinning at susceptible locations in the ESW system stagnant piping in ECCS rooms	A.2.8, GL 89-13 Activities	Prior to period of extended operation	UFSAR Supplement Appendix A.2.8 letter dated November 26, 2002
10	Perform one-time inspection of a cast iron fire protection component for selective leaching	A.2.9, Fire Protection Activities	Prior to period of extended operation	UFSAR Supplement Appendix A.2.9 letter dated November 26, 2002
11	Perform functional testing of sprinkler heads	A.2.9, Fire Protection Activities	Prior to year 50 of sprinkler service life	UFSAR Supplement Appendix A.2.9 letter dated November 26, 2002
12	Perform inspection of electrical conduits in outdoor environment	A.2.9, Fire Protection Activities	Prior to period of extended operation	RAI 3.5.3 response, letter dated May 21, 2002
13	Perform inspection of Susquehanna substation wooden pole	A.2.11, Susquehanna Substation Wooden Pole Inspection Activity	2003 and every 10 years thereafter	UFSAR Supplement Appendix A.2.11 letter dated November 26, 2002
14	Perform one-time inspection of wall thickness of selected torus piping	A.3.1, Torus Piping Inspection Activities	Prior to period of extended operation	UFSAR Supplement Appendix A.3.1 letter dated November 26, 2002
15	Perform inspection of PVC- insulated Fire Safe Shutdown cables in drywell	A.3.2, FSSD Cable Inspection Activity	Prior to period of extended operation	UFSAR Supplement Appendix A.3.2 letter dated November 26, 2002
16	Implement inspection program for Non-EQ accessible cables and connections, including fuse blocks	A.3.3, Non-EQ Accessible Cable Aging Management Activity	Prior to period of extended operation and every 10 years thereafter	RAI 3.6-1 response letter dated April 29, 2002; and SER Confirmatory Item 3.6.2.2.2-1, letter dated November 26, 2002.
17	Perform one-time piping inspection activities for standby liquid control system, auxiliary steam system, plant equipment and floor drain system, service water system, radiation monitoring system	A.3.4, One-Time Piping Inspection Activities	Prior to period of extended operation	RAI B.1.13-1 response dated May 14, 2002; and RAI 2.1.2-3 and 2.1.2-4 response dated May 21, 2002
18	Perform one-time inspection of susceptible locations for loss of material in fuel pool cooling system to verify effectiveness of fuel pool chemistry activities	A.3.4, One-Time Piping Inspection Activities	Prior to period of extended operation	Response to SER Open Item 3.0.3.6.2- 1, letter dated November 26, 2002

Peach Bottom Atomic Power Station Units 2 & 3 Revised License Renewal Commitment Listing

Item	Commitment	UFSAR Supplement Location	Frequency	Source
19	Perform one-time inspection of carbon steel piping for loss of material in RPV instrumentation and Reactor Recirculation system	A.3.4, One-Time Piping Inspection Activities	Prior to period of extended operation	Response to SER Open Item 3.1.3.2.1- 1, letter dated November 26, 2002.
20	Perform testing of inaccessible medium voltage cables	A.3.5, Inaccessible Medium Voltage Cables not subject to 10CFR50.49 Environmental Qualification Requirements	Prior to period of extended operation	SER Open Item 3.6.1.2.1-1 response dated November 20, 2002
21	Implement the final version of the fuse holder interim staff guidance when issued by the NRC.	A.3.6, Fuse holder Aging Management Activity	Prior to period of extended operation	Response to SER Confirmatory Item 3.6.2.2.2-1, letter dated January 29, 2003
22	Implement fatigue management program	A.4.2, Fatigue Management Activities	Prior to period of extended operation	UFSAR Supplement Appendix A.4.2 letter dated November 26, 2002
23	Submit RPV P-T curves for 54 EFPY as license amendment	A.5.1.1.2, P-T Limit Curves	Prior to period of extended operation	RAI 4.2-5 response dated May 1, 2002
24	Submit RPV circumferential weld examination relief request for 60 years	A.5.1.1.3, Reactor Vessel Circumferential Weld Examination Relief	Prior to period of extended operation	UFSAR Supplement Appendix A.5.1.1.3 letter dated November 26, 2002 and response to RAI 4.2-6, letter dated May 1, 2002
25	Implement BWRVIP-76 when approved by the NRC and accepted by BWRVIP Committee	A.2.7, Reactor Pressure Vessel and Internals ISI Program	Prior to period of extended operation	License Condition
26	Obtain NRC review and approval for an inspection program if used, to manage the effects of fatigue for RPV studs when CUF approaches 1.0	A5.2.1 Reactor Vessel Fatigue	Prior to period of extended operation	UFSAR Supplement Appendix A.5.2.1 and RAI 4.3-1 response dated May 1, 2002
27	Perform plant specific calculation for locations identified in NUREG CR-6260 for older vintage plants to manage the effects of environmental fatigue. If position is modified based on industry activities, obtain NRC approval prior to implementation	A.5.2.4 Effects of Reactor Coolant Environment on Fatigue Life of Components and Piping	Prior to period of extended operation	UFSAR Supplement Appendix A.5.2.4 and RAI 4.3-6 response dated May 1, 2002