

April 14, 2003

Mr. Michael P. Gallagher
Director, Licensing & Regulatory Affairs
Mid-Atlantic Regional Operating Group
Exelon Corporation
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: ERRATA TO LICENSE RENEWAL SAFETY EVALUATION REPORT FOR
PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

Dear Mr. Gallagher:

By letter dated July 2, 2001, Exelon Generation Company, LLC (Exelon), submitted an application to the U. S. Nuclear Regulatory Commission (NRC) for renewal of the Peach Bottom Atomic Power Station (Peach Bottom), Units 2 and 3, operating licenses for an additional 20 years. On February 5, 2003, the NRC staff issued its safety evaluation report (SER) to document the findings of the safety review of the license renewal application (LRA) and supporting documentation for Peach Bottom, Units 2 and 3.

In Section 2.3.2.7.2 of the SER, the staff documented its evaluation of the scoping and screening of components and supporting structures in the standby gas treatment system (SGTS) for inclusion within the scope of license renewal and subject to an aging management review (AMR) to close Open Item 2.3.2.7.2. Shortly after the SER was issued, the staff determined that it had not clearly documented its evaluation of the License Renewal Program for the electric heating coils in the standby gas treatment system (the response was provided by Exelon in a letter dated November 26, 2002). Therefore, SER page 2-47 was revised to clarify the staff's evaluation. This letter transmits the revised page (Enclosure 1).

In Section 2.3.3.8.2 of the SER, the staff documented its evaluation of the scoping and screening of control room ventilation system (CRVS) components and supporting structures. Shortly after the SER was issued, the staff determined that it had not clearly documented its evaluation of the preheat coil. Therefore, SER page 2-73 was revised to clarify the staff's evaluation. This letter transmits the revised page (Enclosure 1).

There were several instances in Sections 2.3.2.7.2, 2.3.2.8.2, 2.3.2.8.3, 2.3.3.9.2, 2.3.3.9.3, 3.2.1.2.2, 3.2.1.3, and 4.5.3, where the staff did not remove the phrase "with the exception of Open Item" or "with the exception of Confirmatory Item." These statements should have been removed because all Open and Confirmatory Items were resolved. These statements have now been removed.

M. Gallagher

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In addition, Exelon submitted comments on the SER (ADAMS Accession No. ML030930470) on February 20, 2003. The staff considered these comments in finalizing the SER as NUREG-1769.

If you have any questions regarding these matters, please contact me at 301-415-1973.

Sincerely,

/RA/

David Solorio, Senior Reactor Engineer
License Renewal Section
License Renewal and Environmental Impacts
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos.: 50-277 and 50-278

Enclosure: As stated

cc w/encl: See next page

M. Gallagher

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Enclosure 1

Page 2-47 of the SER Related to Peach Bottom License Renewal Application
Page 2-73 of the SER Related to Peach Bottom License Renewal Application

specialties-discharge nozzles. The heating coils, which are electric heating coils, were evaluated and determined to be within the scope of license renewal. They are installed and enclosed within the SGTS filter plenum. The plenum is included in LRA Table 2.3.2-7 and subject to an AMR. These electric heating coils are active components and do not have a pressure boundary housing, and, therefore, they are not subject to an AMR. In addition, the staff confirmed that the Peach Bottom, Units 2 and 3, technical specification, 3.6.4.3, "Ventilation Systems," Surveillance Requirements 3.6.4.3.2 verifies the performance of the electric coils of the filtration system.

On the basis of the additional information provided by the applicant regarding the demisters, fire spray nozzles and electric heating coils, the NRC staff agrees with the applicant's response for the demisters and fire spray nozzles since they are subject to an AMR as identified in Tables 3.2-7 and 3.3-7, respectively. The staff agrees that the electric heating coils are within the scope of license renewal but do not require an AMR because 10 CFR 54.21 specifies that only components that perform their function with moving part or by changing state are within the scope of license renewal; therefore, Open Item 2.3.2.7.2-1 is closed.

In RAI 2.3.2.7-1(b) the staff asked why LRA Table 2.3.2-7 did not identify the drywell purge supply and exhaust filtration system components and their housings shown on license renewal drawing LR-M-391, sheets 1 and 2, as falling within the scope of license renewal. Specifically, the staff the asked applicant to justify the exclusion of the following components and housings:

1. piping (or ductwork) and valve (or damper) housings for AO-20452 through AO-20470 at locations F7, E7, D7&D8, F3&F4, E2&E3, D3, C4, and B4
2. piping (or ductwork) at locations between B6 through E6
3. instrumentation taps at locations F3, F7, E2, E7, D3, D7 (two), and B6
4. piping (or ductwork) and valve (or damper) housings for AO-30452 through AO-30470 at locations F7, E7, D7&D8, F3&F4, E2&E3, D3, C4, and B4
5. piping (or ductwork) at locations between B6 through E6
6. instrumentation taps at locations F3, F7, E2, E7, D3, D7 (two), and B6

The applicant responded that the components identified above are part of the secondary containment as shown by the flag "SC" on drawing LR-M-391, sheets 1 and 2, Rev. A. As such, the valve bodies, ductwork, and tubing are shown in Table 2.3.2-8 in LRA Section 2.3.2.8. The staff considered the applicant's response to the RAI acceptable since the components were subject to an AMR and were identified in Table 2.3.2-8 of the LRA. However, the applicant needs to indicate that valve bodies include damper housings for the SGTS dampers, if any, in LRA Table 2.3.2-7. This was part of Open Item 2.3.2.7.2-2. The additional part of this item is discussed in Section 2.3.2.8.2 of this SER.

In a letter dated November 26, 2002, the applicant provided the following clarification regarding valve bodies including damper housings for the SGTS dampers.

License renewal drawings LR-M-391, Sheets 1 and 2, Rev. A, show a portion of the SGTS and a portion of the secondary containment system that are in the scope of license renewal. System boundary flags delineate these two systems. The secondary containment system includes air-operated butterfly valves and does not include any dampers (P & ID symbols for butterfly valves and dampers are shown on LR-M-300 sheet 2). Therefore, LRA Table 2.3.2-8, Component Group Requiring Aging Management Review - Secondary Containment System,

housings in LRA Table 2.3.2-8 to indicate that they are subject to an AMR or justify their exclusion from an AMR. This was Open Item 2.3.3.8.2-1.

In a letter dated November 26, 2002, the applicant provided clarifying information concerning the filter housings of the HEPA filters. In response to the Open Item, the applicant stated that the HEPA filters shown on drawing LR-M-384 sheet 1 are installed and fully enclosed inside filter plenum (filter housing). The filter plenum is included in the scope of license renewal and subject to an AMR, and is identified in the LRA Table 2.3.3-8 as a sheet metal plenum, and the NRC staff agrees with the applicant's clarification for the filter housings of the HEPA filters. Therefore, Open Item 2.3.3.8.2-1, is closed.

In RAI 2.3.3.8-3, the staff indicated that LRA Table 2.3.3-8 did not identify test connections shown on license renewal drawing LR-M-384, sheet 1, Rev. A, at locations D1 (three locations), F1(three locations), F5 (three locations), F6 (two locations), G2 (one location), G4 (two locations), D2 (one location), D3 (one location), D5 (three locations), and D6 (three locations). The staff requested that the applicant provide justification for the exclusion of these test connections from Table 2.3.3-8 of the LRA as not subject to an AMR.

In response to RAI 2.3.3.8-3, the applicant stated that the test connections are included in the scope of license renewal and are subject to an AMR. The test connections are considered as part of the ventilation ductwork hardware for license renewal. The staff considers the applicant's response to RAI 2.3.3.8-3 to be acceptable.

In RAI 2.3.3.8-4, the staff requested that the applicant clarify whether sealant materials at PBAPS Units 2 and 3, used to maintain the MCRE at positive pressure with respect to the adjacent areas in order to prevent the unfiltered in-leakages inside MCRE, are included in the scope of license renewal and subject to an AMR, and if so, provide the relevant information to complete Table 2.3.3.8 of the LRA. If the sealants are not considered subject to an AMR, the applicant was asked to provide justification for their exclusion. The applicant responded that sealant materials are included as a commodity item in LRA Section 2.4.14, in Table 2.4-14. The staff considers the applicant's response to be acceptable.

In RAI 2.3.3.8-5, the staff identified that GDC 19 of Appendix A to 10 CFR Part 50 requires cooling and protection against radiation and toxic gas release in order to achieve and maintain MCRE habitability during and after an accident. The staff requested the applicant to clarify whether the following main control room (MCR) cooling system components and their associated housings fall within the scope of license renewal and are subject to an AMR because they provide a safety-related cooling function:

Drawing LR-M-384, sheet 2:

- supply fans, OAV028 at location F6 and OABV028 at location C5
- cooling coils, OAE069 at location F5 and OBEV069 at location C5
- supply roll filter, OOF038 at location E3
- bag filter, OOF057 at location E4
- preheat coil, OOE110 at location F2
- louver at location F1
- ductwork, dampers, and instrumentation tubing and valves