

10 CFR 50.55a

August 4, 2008

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555Peach Bottom Atomic Power Station, Units 2 and 3  
Renewed Facility Operating License Nos. DPR-44 and DPR-56  
NRC Docket Nos. 50-277 and 50-278

Subject: Relief Requests Associated with the Third and Fourth Inservice Inspection (ISI) Intervals and the First and Second Containment Inservice Inspection (CISI) Intervals - Response to Request for Additional Information Concerning Relief Request CRR-13

- References:
- 1) Letter from P. B. Cowan (Exelon Generation Company, LLC) to U. S. Nuclear Regulatory Commission, "Submittal of Relief Requests Associated with the Third and Fourth Inservice Inspection (ISI) Intervals and the First and Second Containment Inservice Inspection (CISI) Intervals," dated February 29, 2008
  - 2) Letter from J. D. Hughey (U. S. Nuclear Regulatory Commission) to C. G. Pardee (Exelon Generation Company, LLC), "Peach Bottom Atomic Power Station, Units 2 and 3 – Request for Supplemental Information Regarding Relief Request I4R-44 (TAC NOS. MD8296 and MD8297)," dated May 7, 2008
  - 3) Letter from P. B. Cowan (Exelon Generation Company, LLC) to U. S. Nuclear Regulatory Commission, "Response to Request for Supplemental Information Associated with Relief Request I4R-44," dated May 13, 2008
  - 4) Letter from J. D. Hughey (U. S. Nuclear Regulatory Commission) to C. G. Pardee (Exelon Generation Company, LLC), "Peach Bottom Atomic Power Station, Units 2 and 3: Request for Additional Information Regarding Relief Request CRR-13 Associated with the First and Second Containment Inservice Inspection Intervals (TAC NOS. MD8308 and MD8309)," dated July 9, 2008

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Relief Requests Associated with Third and Fourth ISI Intervals  
and First and Second CISI Intervals  
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In the Reference 1 letter, Exelon Generation Company, LLC (EGC) submitted for your review and approval relief requests associated with the third and fourth Inservice Inspection (ISI) intervals for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. Also included for your review and approval were relief requests associated with the first and second Containment Inservice Inspection (CISI) intervals for PBAPS, Units 2 and 3.

References 2 and 3 concern previous requests for information associated with these relief requests.

In the Reference 4 letter, the U. S. Nuclear Regulatory Commission Staff requested additional information. Attached is our response to this request.

There are no regulatory commitments contained in this letter.

Should you have any questions concerning this letter, please contact Tom Loomis at (610) 765-5510.

Respectfully,

gbc  


Pamela B. Cowan  
Director – Licensing & Regulatory Affairs  
Exelon Generation Company, LLC

Attachments: 1) Response to Request for Additional Information – Relief Request CRR-13  
2) Drawing 6280-S-188

cc: S. J. Collins, Regional Administrator, Region I, USNRC  
F. Bower, USNRC Senior Resident Inspector, PBAPS  
J. Hughey, Project Manager, USNRC  
S. T. Gray, State of Maryland  
R. R. Janati, Commonwealth of Pennsylvania

**Attachment 1**

**Response to Request for Additional Information – Relief Request CRR-13**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
REGARDING RELIEF REQUEST CRR-13 ASSOCIATED WITH THE  
FIRST AND SECOND CONTAINMENT INSERVICE INSPECTION INTERVALS  
PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3**

**Question 1:**

By letter dated February 29, 2008, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML080640587), Exelon Generation Company, LLC, submitted Relief Request CRR-13 associated with the first and second Containment Inservice Inspection intervals for Peach Bottom Atomic Power Station, Units 2 and 3. The Nuclear Regulatory Commission (NRC) staff has reviewed the request for relief the licensee provided in the February 29, 2008, submittal. In order for the NRC staff to complete its evaluation, response to the following request for additional information (RAI) questions is requested.

RAI-1) To facilitate the NRC staff's understanding of the as-constructed configuration of the drywell with the embedded construction manway N-3, please provide a detail drawing of a vertical section of the drywell passing through the location of the N-3 manway. Please provide a detail that shows the as-constructed structural configuration of the drywell including its concrete components (i.e., concrete floor, concrete foundation and concrete wall with important dimensions and elevations).

**Response:**

Drawing 6280-S-188 is contained in Attachment 2. This drawing represents the as-constructed structural configuration of the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3 drywells, including their concrete components.

**Question 2:**

RAI-2) Please confirm if the seal weld for the manway penetration was radiographed and tested for leak-tightness (indicate method used) prior to being covered with concrete.

**Response:**

Relief Request CRR-13 is based on the drawings and the Specification for Reactor Drywell and Suppression Chamber Containment Vessels. Note 1 on drawing S-188 states that a pneumatic test was performed prior to the concrete pours and the weld was seal welded. A search of construction records could not confirm that radiograph was performed on the seal weld for the manway path.

On December 24, 1968, an initial overload and leak rate test was completed satisfactorily on the Unit 2 Containment Vessel. The highest pressure recorded was 71.3 psig and the leakage was determined to be .0072% per 24 hours. The allowable leakage rate per Bechtel Specification 6280-C-2, paragraph 8.2.4.3, is 0.2% per 24 hours. As indicated in Specification 6280-C-2, the test was to be performed prior to the concrete pour.

**Response To Request For Additional Information  
Regarding Relief Request CRR-13 Associated With The  
First And Second Containment Inservice Inspection Intervals  
Peach Bottom Atomic Power Station, Units 2 And 3**

On May 23, 1970, an initial leakage rate test was completed satisfactorily on the Unit 3 Containment Vessel. The highest pressure recorded was 74.3 psig and the leakage was determined to be 0.078% per 24 hours. The allowable leakage rate per Bechtel Specification 6280-C-2, paragraph 8.2.4.3, is 0.2% per 24 hours. As also indicated in Specification 6280-C-2, the test was to be performed prior to the concrete pour.

**Question 3:**

RAI-3) Since the proposed alternative in Section 6 is the Appendix J Integrated Leak Rate Testing, please provide the results, with dates and acceptance criteria, of the most recent two Type A tests performed on the Primary Containment at Peach Bottom Atomic Power Station, Unit 2 and Unit 3.

**Response:**

The results from the last two (2) Integrated Leak Rate Tests (ILRTs) at PBAPS, Units 2 and 3 are as follows:

**PBAPS, Unit 2:**

		ILRT Total
ILRT Date	Calculation Method	Weight Percent Per Day (%/day)
March 1991	Total Time Analysis based on BN-TOP-1, Rev. 1, 1972	0.2135
October 2000	Absolute Method Mass Point per 56.8-1994	0.3365

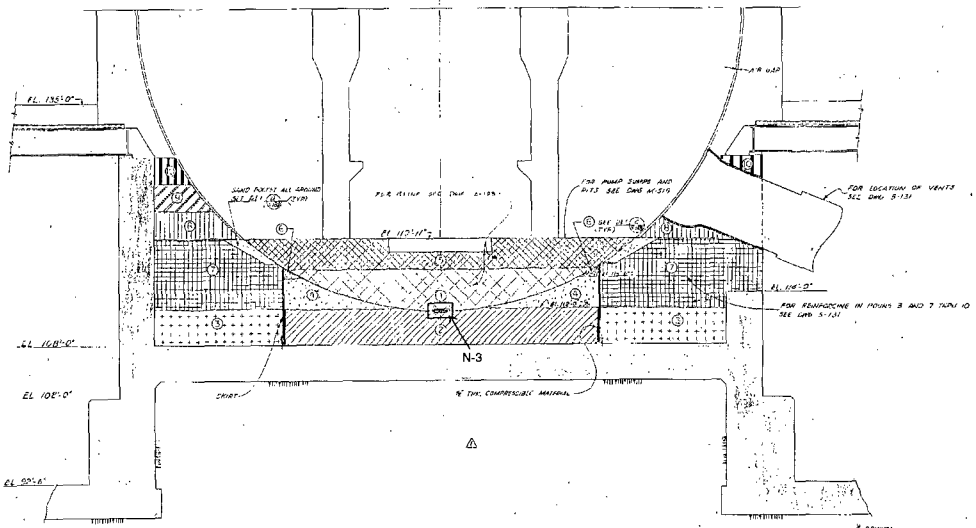
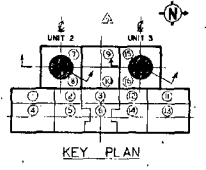
**PBAPS, Unit 3:**

		ILRT Total
ILRT Date	Calculation Method	Weight Percent Per Day (%/day)
December 1991	Absolute Method Mass Point per 56.8-1987	0.1386
October 2005	Total Time Analysis based on BN-TOP-1, Rev. 1, 1972	0.2781

Acceptance criteria: 0.375 Weight Percent Per Day (%/day)

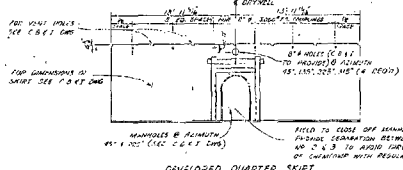
**Attachment 2**

**Drawing 6280-S-188**



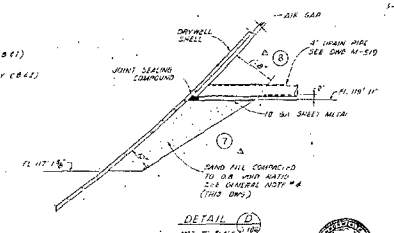
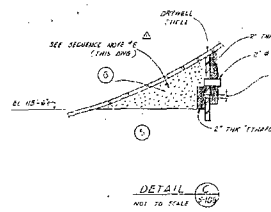
- SEQUENCE OF CONCRETE POURS UNDER DRYWELL SHELL**
1. AFTER COMPLETION OF AUTOMATIC TESTS ON THE DRYWELL, SEAL AROUND THE PERIMETER IN THE BOTTOM OF THE DRYWELL, INSTALL ROCKET AND PLACE CONCRETE POUR #1 UNDER THE TRAYWELL UP TO EL. 115'-0" (5').
  2. MAKE FINESTRE POUR #2 UNDER THE DRYWELL, UTILIZING GREASING IN SHORT FOR FLEXIBLE MANHOLES. PLACE CONCRETE UP TO BOTTOM OF DRYWELL, PUMPING PRESSURE ON DRYWELL SHELL SHALL NOT EXCEED 2 PSI. USE COARSE CHIP MANHOLES IN THE SHORT DEWELL POUR #3.
  3. PLACE CONCRETE POUR #3 UNDER THE DRYWELL UP TO EL. 115'-0" (5').
  4. SEVEN DAYS AFTER POUR #3, PLACE CONCRETE POUR #4 TO MAKE THE SHORT UP TO EL. 115'-0" (5').
  5. PLACE CONCRETE POUR #5 UNDER THE DRYWELL UP TO EL. 115'-0" (5').
  6. OUTER SHEET MAY BE 1/2" THICK C.B. & L. J. L. LESS THAN 1/2" AFTER COMPLETION OF POUR #5. INSTALL OUTER TRAYWELL PRIOR TO THE CUT PORTION OF THE SHORT. SEVEN DAYS AFTER POUR #5, REMOVE SHORT POUR #6 THROUGH 2" MANHOLES IN SHORT. CHECK FOR SOUND OVERLAY THROUGH HOLES IN TOP OF SHORT. SUFFICIENT MANHOLES NOT TO EXCEED 10' DIA.
  7. INSTALL DRAIN PIPES AND SAND SOCKET PIPES. PLACE ROCKET AND MAKE CONCRETE POUR #7 UP TO EL. 115'-0" (5').
  8. FILL SAND SOCKET AS PER DET. C. & D. & PLACE CONCRETE POUR #8 THROUGH #10 IN SEQUENCE. FOR CONSTRUCTION OF DRYWELL AIR GAP. SEE FIG. 3-219 AND SPECIFICATION 6302-C-24.

SECTION A-A



- GENERAL NOTES**
1. FOR GENERAL COMMENTS NOTES & DETAILS SEE 5-11 & 5-12.
  2. ALL CONCRETE IN POURS #2 & 4-8 SHALL BE CLASS B, COMPRESSED TO SPEC. 6302-C-25 WITH 60 DAY COMP. STRENGTH OF 4000 PSI. ALL OTHER CONCRETE SHALL BE CLASS B, 4000 PSI 90 DAY COMP. STRENGTH. IN REED #10, SHORT SHALL BE REINFORCED OVERLAY WITH #4 "SIC" REBAR-35.
  3. FOR SOUND TESTS & BRANDED, SEE PUMPING AND DRAINAGE 6302-A-519.
  4. SANDFILL IN THE POCKET SHALL BE TYPE "A" AS PER DET. OF AIRWAY SUPERSTRATA FOR FINE AGGREGATES (COMMERCIALLY AVAILABLE) AND SAND SHALL BE COMPACTED TO 95% V.D. IN ACCORDANCE WITH SPECIFICATION 6302-C-25.

- REFERENCE DRAWINGS**
- 5-11 FOUNDATION PLAN AREA 1
  - 5-12 FOUNDATION PLAN AREA 2
  - 5-13 VENT WALL DEVELOPMENT SECTIONS C DETAILS
  - 5-17a FURNACE VENT WALL FOUNDATION PLAN, SECTION D DETAIL
  - 5-17b DETAIL VENT - ROCKET HEAD W. 6302-C-250



NO.	DESCRIPTION	DATE	BY	CHKD.
1	ISSUED AS BUILT	10/15/88	W. J. H.	W. J. H.
2	REVISED FOR CONSTRUCTION	10/15/88	W. J. H.	W. J. H.
3	REVISED FOR CONSTRUCTION	10/15/88	W. J. H.	W. J. H.
4	REVISED FOR CONSTRUCTION	10/15/88	W. J. H.	W. J. H.
5	REVISED FOR CONSTRUCTION	10/15/88	W. J. H.	W. J. H.
6	REVISED FOR CONSTRUCTION	10/15/88	W. J. H.	W. J. H.
7	REVISED FOR CONSTRUCTION	10/15/88	W. J. H.	W. J. H.
8	REVISED FOR CONSTRUCTION	10/15/88	W. J. H.	W. J. H.
9	REVISED FOR CONSTRUCTION	10/15/88	W. J. H.	W. J. H.
10	REVISED FOR CONSTRUCTION	10/15/88	W. J. H.	W. J. H.

**BECHTEL**  
SAN FRANCISCO, CALIF.

BECHTEL PROJECT NO. 6280

REACTOR BUILDING  
DRYWELL VESSEL FOUNDATION  
POUR SEQUENCES UNITS 2 & 3

6280 5-188 3