PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF VICE PRESIDENT ELECTRIC PRODUCTION

December 11, 1979

Re: Docket Nos. 50-277 50-278

Mr. T. A. Ippolito, Chief Operating Reactors Branch #3 Division of Operating Reactors U.S. Nuclear Regulatory Commission Washington, DC 20555

> References: a) T. A. Ippolito (NRC) letter to E. G. Bauer (PECO) dated November 29, 1978
> b) T. A. Ippolito (NRC) letter to E. G. Bauer (PECO) dated October 22, 1979
> c) J. W. Gallagher (PECO) letter to D. G. Eisenhut (NRC) dated October 25, 1979

Dear Mr. Ippolito:

This is in response to your letter to E. G. Bauer dated October 22, 1979, regarding containment purging and venting during normal operation. This topic has been the subject of a continual dialogue between the NRC, PECO, and our valve manufacturers since receipt of your November 29, 1978, letter. The following is our complete reply to your latest letter.

In accordance with your request, PECO will operate in conformance with the NRC's suggested "Interim Position for Containment Purge and Vent Valve Operation Pending Resolution of Isolation Valve Operability". The use of the large diameter purge and vent valves during power operation will be minimized and shall not exceed 90 hours per year, except when purging is being performed in the "batched" mode. The valves shall be limited to a maximum of 37 degrees open wherever the reactor is not in the cold shutdown or refueling mode. This maximum opening has been conservatively determined in consultation with the valve supplier such that the isolation function can be successfully carried out in the required time period under DBA - LOCA loads. These limitations shall apply to the following valves:

1614 302

7912180606

UNIT 2	UNIT 3
A0-2505	A0-3505
A0-2506	A0-3506
A0-2507	A0-3507
A0-2511	A0-3511
A0-2512	A0-3512
A0-2519	A0-3519
A0-2520	A0-3520
A0-2521A,B	A0-3521A,B

We have been actively pursuing the qualification of the large diameter purge and vent valves since our meeting with the NRC Staff in Bethesda, Maryland, on August 24, 1979. As a part of these efforts, letters were sent to Bechtel Fower Corporation and Fisher Controls Company on September 20, 1979, and September 21, 1979, requesting that they immediately begin the required analyses. Our recent letter dated October 25, 1979, from J. W. Gallagher (PECO) to D. G. Eisenhut (NRC) concerning containment purging and venting during normal operation committed to the completion of our valve qualification efforts by April 30, 1980, and elaborated on the scope of these efforts. Our re-evaluation of valve performance will include consideration of the concerns identified in IE Bulletin 79-01A, as appropriate.

Very truly yours,

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