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SHIELDS L. DALTROFF
VICE PRESIDENT
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January 18, 1980

Re: Docket Nos. 50-277
50-278

IE Bulletin 80-01

Mr. Boyce H. Grier, Director
Office of Inspection and Enforcement
Region I
United States Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Grier:

This letter is in response to IE Bulletin 80-01, forwarded to us on January 14, 1980, concerning the operability of ADS valve pneumatic supply. The "Action to be Taken by Licensees" and our responses are treated sequentially.

Action to be Taken by Licensee

1. Determine if your facility has installed hard-seat check valves to isolate the ADS accumulator system from the pneumatic supply system.

Response

Hard-seat swing check valves (1" Power Model No. 2341) were installed to isolate the ADS accumulators from the non-safety grade supply system. These have been replaced with soft-seat, spring-loaded check valves (1" NUPRO Model SS-16C4-1) to assure minimal leakage.

2. Determine if periodic leak tests have been performed on your ADS accumulator systems to assure emergency pneumatic supply

for the FSAR-required number and duration of valve operations.

Response

Prior to December 1979, leak tests had not been performed on the ADS accumulator systems. When leak tests were performed and the significance of the results analyzed, the Peach Bottom Units were shut down, the check valves were replaced, and all portions of the accumulator systems were leak tested (check valves, piping, accumulators, solenoid valves, tubing, diaphragms). With the new valves installed, the total leakage rate out of the accumulators was found to be between 0 and 10 scc/min for all assemblies. If a leakage of 10 scc/min is assumed, calculations indicate that each ADS valve will be operable for the FSAR-specified minimum five actuations at atmospheric drywell pressure for in excess of 14 hours over a range of containment conditions which could be expected to accompany the need for ADS operation. The FSAR does not specify criteria for the duration of the valve actuation capability.

3. Review seismic qualifications of the ADS pneumatic supply system:

   a) from accumulator system isolation check valve to ADS valve operator,

   b) from isolation valve outside containment up to ADS accumulator check valve.

Response

a) During the unit outages taken for check valve replacement, instrument air piping in the drywell was reviewed by Bechtel and PECO engineers to determine the extent and adequacy of seismic supports. A total of two additional seismic supports were required to meet the seismic design criteria for the ADS accumulator systems (check valves through SRV actuator diaphragms).

b) Seismic supports are not provided for the ADS pneumatic supply from the isolation value outside containment up to the ADS accumulator check valve, however, system operability is not affected because the ADS accumulator system is seismically qualified.

4. Based upon determination of items 1, 2, and 3 above, evaluate operability of the ADS for the conditions under which it is required to be operable including a seismic

event. If operability cannot be established adhere to appropriate Technical Specification action statement.

Response

The results of a continuing detailed engineering evaluation being conducted by PECO and GE have thus far shown that the modified ADS valve air supplies will permit ADS operation for all conditions for which it is required to be operable.

5. Provide an immediate notification to the NRC in the event the ADS is found to be operable.

Response

Immediate notification was provided to the NRC on January 10, 1980.

Very truly yours,

cc: United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Division of Reactor Operations Inspection
Washington, DC 20555