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February 19, 1980

Mr. Thomas A. Ippolito
Chief, Operating Reactors Branch No. 3
Division of Operating Reactors
US Nuclear Regulatory Commission
Washington, DC 20555

RE: Peach Bottom Atomic Power Station
Inservice Inspection Program
Units No. 2 and 3. Docket Nos. 50-277 & 50-278

Dear Mr. Ippolito:

Philadelphia Electric Company requests modification to an ultrasonic examination requirement in the 1974 edition of Section XI of the ASME Boiler and Pressure Vessel Code, as applicable to the Inservice Inspection Program at Peach Bottom Atomic Power Station. Specifically, we are requesting that the acceptance criteria in Article IWA-3000, Paragraph IWA-3100 (b) referenced to the original construction code be based on a code no earlier than that utilized during the baseline inservice inspection examinations (1968 Edition of ASME Section III).

The adoption of the 1974 Edition of Section XI has created some inconsistencies between examinations conducted today and those conducted during previous ISI examinations, including the baseline. The governing code for the baseline examinations at Peach Bottom was the 1970 Edition of ASME Section XI and where practicable the guidelines of Addenda through Winter 1971. Examinations performed to the 1970 edition of the Code were evaluated, as per Article IS-300, in accordance with the acceptance criteria specified in the 1968 Edition of the ASME Code, Section III. Baseline examinations and all examinations conducted prior to September 1978 were evaluated in accordance with this Code. Subsequently, the standard for the Peach Bottom Inservice Inspection Program was upgraded to the 1974 Edition of ASME Code Section XI, including Addenda through Summer 1975 in

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accordance with 10 CFR 50.55a. The adoption of the 1974 Edition of Section XI creates an inconsistency for Peach Bottom in that Article IWA-3000, Paragraph IWA-3100 (b), now specifies that indications be evaluated in accordance with the acceptance criteria of the Code applicable to the construction of the component. At Peach Bottom, certain components were constructed to the 1965 Edition of ASME Section III, which predates the 1968 Edition of ASME Section III used for the entire baseline examination. The calibration blocks, examination procedures, and evaluation criteria are so significantly different between the 1965 Code and later editions, that there is very little correlation between respective examination results.

Accordingly, it is requested that the construction code referenced in Paragraph IWA-3100 (b) be interpreted at Peach Bottom to mean the 1968 Edition of ASME section III. This approach will maintain the necessary consistency between the baseline examinations and future ISI examinations to meet the intent of ASME section XI. It is requested that this relief be considered applicable to all examinations conducted at Peach Bottom under the 1974 Edition of Section XI.

If you have any questions regarding this matter, please contact us.

Very truly yours,

