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SHIELDS L. DALTROFF
VICE PRESIDENT
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March 3, 1980

Re: Docket Nos. 50-277
50-278

IE Bulletin 79-01B

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

Dear Mr. Grier:

This letter is in response to IE Bulletin 79-01B, forwarded to us on January 14, 1980, concerning environmental qualification of Class IE equipment. The "Action to be Taken by Licensees" and our responses are treated sequentially.

Action to be Taken by Licensee

1. Provide a "master list" of all Engineered Safety Feature Systems (Plant Protection Systems) required to function under postulated accident conditions. Accident conditions are defined as the LOCA/HELB inside containment, and HELB outside containment. For each system within (including cables, EPA's terminal blocks, etc.) the master list identify each Class IE electrical equipment item that is required to function under accident conditions. Pages 1 and 2 of Attachment 2 are standard formats to be used for the "master list" with typical information included.

Electrical equipment items, which are components of systems listed in Appendix A of Attachment 4, which are assumed to operate in the FSAR safety analysis and are relied on to mitigate design basis events are considered within the scope

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of this Bulletin, regardless whether or not they were classified as part of the engineered safety features when the plant was originally licensed to operate. The necessity for further upgrading of nonsafety related plant systems will be dependent on the outcome of the licensees and the NRC reviews subsequent to TMI/2.

RESPONSE

A master list of all Engineered Safety Feature Systems required to function under the described postulated accident conditions is provided in Section I of Attachment A. For each system within the master list, each Unit 2 & 3 Class IE equipment item that is required to function under the described postulated accident conditions is provided according to the standard format. The scope of the Electrical Power System includes wiring materials, and the use of the identified wiring materials is applicable to all other systems. The plant emergency procedures which apply to the described postulated accident conditions have been reviewed. Unit 2 and 3 equipment, which is located in a hazardous environmental area and is not Class IE but is assumed to operate in the emergency procedures, is identified in Section II of Attachment A.

2. For each class IE electrical equipment item identified in Item 1, provide written evidence of its environmental qualification to support the capability of the item to function under postulated accident conditions. For those class IE electrical equipment items not having adequate qualification data available, identify your plans for determining qualifications of these items and your schedule for completing this action. Provide this in the format of Attachment 3.

RESPONSE

The written evidence of environmental qualification for each identified Unit 2 Class IE equipment item is included in Section I of Attachment A. The written evidence including the plans for resolving qualification documentation deficiencies is provided in the requested format except that Notes and References are provided as a subsection of Section I and are applicable to all systems. The Unit 3 equipment is identical to the Unit 2 equipment in most cases; however, due to the volume of work required for the 45-day response a specific review for the Unit 3 equipment has not been completed. It will be completed and included in the 90-day response to this Bulletin.

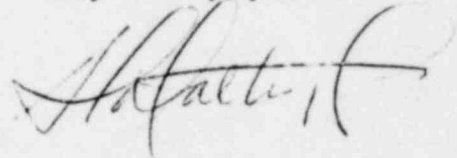
3. For equipment identified in Items 1 and 2 provide service condition profiles (i.e., temperature, pressure, etc., as a

function of time). These data should be provided for design basis accident conditions and qualification tests performed. This data may be provided in profile or tabular form.

RESPONSE

A preliminary HELB accident analysis for outside primary containment has been completed, however, a review of the analysis has revealed that the approach was overly conservative. In order to establish realistic HELB accident environmental conditions a re-analysis has been undertaken and is scheduled for completion by April 10, 1980. The HELB accident service conditions will be submitted within 30 days after completion of the re-analysis in order to provide our engineering department adequate time to review the profiles. The LOCA profile for inside primary containment and the Class IE equipment qualification test profiles/tabulations are included in the Notes and References, subsection of Attachment A, Section I.

Very truly yours.

A handwritten signature in cursive script, appearing to read "H. Grier", is written over the typed name "Attachment".

Attachment

cc: Office of Inspection & Enforcement
United States Nuclear Regulatory Commission
Washington, DC 20555