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June 4, 1980

Mr. Harold R. Denton
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Implementation of Lessons Learned Short Term Requirements - Peach Bottom Atomic Power Station

REFERENCE: Letter dated January 2, 1980, from S.L. Daltroff to H. R. Denton. Subject: Design Review Studies Required by Short Term Lessons Learned - Peach Bottom Nuclear Power Station

Dear Mr. Denton:

The referenced letter under item 2.1.8b described the high range effluent noble gas monitors installed at Peach Bottom Atomic Power Station. We have subsequently reviewed the system and the criteria set forth in your October 30, 1979, clarification letter and have concluded that the system meets the criteria specified in Table 2.1.8.b.2 with the exception of the ANSI N320-1979 specification.

Our review of vendors supplying similar equipment showed that ANSI N320-1979 criteria could not be met with presently available systems. We discussed this matter with your staff and were informed that the ANSI N320-1979 criteria would not be required for item 2.1.8b. Therefore, it is our intent to make no further changes in the high range noble gas monitoring system in 1980.

However, we are presently reviewing the entire monitoring system at Peach Bottom Atomic Power Station, including the routine monitors, and expect to modify or replace as deemed appropriate to meet other related requirements. This work is

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presently in progress with effluent monitor modifications expected in 1981.

For your background, the attached table provides a description of the presently installed system and a comparison to your October 30, 1979, criteria.

Very truly yours,

Attachment

Comparison of PBAPS Noble Gas Monitors with NUREG-0578 Criteria

Item	10/30/79 Letter, Table 2.1.8.b.2 Requirements	PBAPS High Range Noble Gas Monitors
Type of Activity	Noble gases only	Noble gases
Range	Overlap normal monitors to 10^4 uCi/cc (diluted containment and reactor building exhaust)	0.28 -1.4 x 10^4 uCi/cc (off-gas stack) See notes 1 and 2.
	Overlap normal monitors to 10^3 uCi/cc (buildings containing primary coolant)	7 x 10^{-2} -1.4 x 10^4 uCi/cc (building vents) See notes 1 and 2.
Redundancy	Not required	No
Seismic	Not required	No
Power	Vital instrument bus	Safeguard power (equivalent)
Other specifications	Per R.G. 1.97 and ANSI N 320-79	R.G. 1.97
Display	Continuous recording with display in TSC and EOC	Continuous recording in CR with display available in the TSC
Qualifications	Not required	No

Note 1: The bottom range of 0.28 and 7 x 10^{-2} uCi/cc result from normal instrument background. Monitor range extends down to 1.4 x 10^{-2} uCi/cc.

Note 2: Overlap between normal and high range monitors is provided. Normal off-gas stack noble gas monitors range to 13 uCi/cc; normal building vent noble gas monitors range to 2.7 uCi/cc for digital control room display and 2.7 x 10^{-2} uCi/cc for recorder.