

PHILADELPHIA ELECTRIC COMPANY

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PHILADELPHIA, PA. 19101

JOSEPH W. GALLAGHER
MANAGER
ELECTRIC PRODUCTION DEPARTMENT

(215) 841-5003

July 17, 1980

Re: Docket Nos. 50-277
50-278

IE Bulletin 80-17

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

Dear Mr. Grier:

This letter provides additional information with respect to item 6.c of our previous response to IE Bulletin 80-17, dated July 14, 1980, concerning the failure of 76 of 185 control rods to fully insert during a scram at a BWR. The "Action to be Taken by Licensees" and our response follows.

Action to be Taken by Licensees

6. In order to mitigate the consequences of an ATWS event, enhanced operability of HPCI, RCIC, SLCS, RPT/RHR/pool cooling and main steam bypass is essential. Accordingly, the following actions are requested:
 - c. Perform a 50.59 review to increase SLCS flow to the maximum consistent with safety (2 pumps, unless unsafe).

Response

Philadelphia Electric Company Engineering Department in conjunction with General Electric and Bechtel Power Corporation is performing a 50.59 review to determine the capability of Peach

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Bottom Units 2 and 3 to increase the Standby Liquid Control System (SLCS) injection flow by operating two pumps.

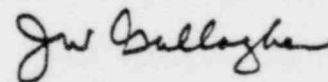
The preliminary results of the review are as follows:

- 1) The SLCS pump discharge piping and components are adequate for two pump operation.
- 2) Section 3.8.3 of the FSAR (SLCS Description) describes an injection time of 50 to 125 minutes for one pump operation. The minimum injection time cannot be complied with since two pump operation results in a 100 gpm flow rate and an injection time of less than 50 minutes. The safety significance of the minimum injection time (i.e. maximum injection rate) is explained in Section 3.8.4 of the FSAR (SLCS Safety Evaluation) which states "...The upper limit injection rate assures that there is sufficient mixing so the boron does not recirculate through the core in uneven concentrations which could possibly cause the nuclear power to rise and fall cyclically".
- 3) The electrical circuitry for the SLCS pumps does not permit simultaneous two pump operation.
- 4) The evaluation of the SLCS pump suction piping requires a sophisticated analytical technique to determine whether the present system can provide adequate NPSH for two pump operation. The completion and review of the necessary calculations is anticipated to be complete by August 8, 1980.

The preliminary results indicate that simultaneous two pump operation without implementing modifications is not feasible at this time.

Should you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,



cc: US Nuclear Regulatory Commission
Office of Inspection & Enforcement
Division of Reactor Operations Inspection
Washington, DC 20555

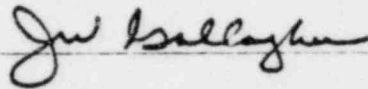
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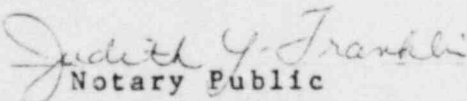
COUNTY OF PHILADELPHIA :

J. W. Gallagher, being first duly sworn, deposes and
says:

That he is Manager of the Electric Production Department
of Philadelphia Electric Company; that he has read the foregoing
response to IE Bulletin 80-17 and knows the contents thereof; and
that the statements and matters set forth therein are true and
correct to the best of his knowledge, information and belief.



Subscribed and sworn to
before me this 18th day
of July, 1980


Notary Public

Notary Public, Philadelphia, Philadelphia Co.

My Commission Expires July 28, 1983