

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

August 19, 1980

Re: Docket Nos. 50-277
50-278

IE Bulletin 80-17
Supplement 1

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 is in response to IE Bulletin 80-17, Supplement 1, forwarded to us on July 18, 1980 concerning the failure of 76 of 185 control rods to fully insert during a scram at a BWR. This response addresses item B.1. Our review of available instrumentation capable of continuously monitoring SDV water level extended beyond the August 15, 1980 response due date. Mr. W. M. Alden, Philadelphia Electric Company (PE), telephoned Mr. R. R. Keimig, Office of Inspection and Enforcement, Region I, on August 18, 1980, who verbally granted PE an extension of the response due date to August 20, 1980, to ensure enough time for adequate review. The "Action to be Taken by Licensees" and our response follows.

Action to be Taken by Licensees

- B.1) Install a system to continuously monitor water levels in all scram discharge volumes. Continuous recording and alarm features must be included in the design. Consideration should be given to use of diverse level sensors in this (these) system(s). The design installed should represent the design with the highest level of reliability compatible with completion of installation by September 1, 1980. Provide a written description of the system design to the NRC Region Office.

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If installation by September 1, 1980 is not possible, by August 15, 1980, submit to the NRC Regional Office:

- 1) Documentation in detail why the installation cannot be completed by 9/1/80.
- 2) A commitment to a firm schedule for installation.
- 3) A commitment to equipment changes and/or surveillance requirements in addition to those now in effect that will provide adequate assurance of SDV operability in the interim until installation is completed.

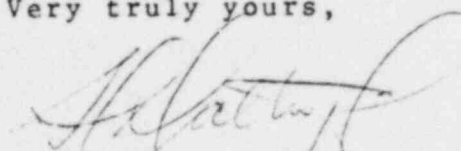
Response

Our review of commercially available instrumentation has determined that the most expedient and yet reliable method for establishing continuous monitoring of water levels in the scram discharge volume (SDV) is the installation of a instrumentation monitoring system designed by General Electric Company (GE). The GE system utilizes an ultrasonic pulse echo thickness measuring device to detect water in the SDV header. We have initiated steps to procure the GE instrumentation package for both Peach Bottom Units 2 and 3 as described in GE Proposal Number 416-TY356-HE2 & HE3 dated August 8, 1980. However, the GE system will not be available for the September 1, 1980 installation date.

The shipment of the necessary hardware by GE is anticipated to be six weeks after the receipt of the first plant's order with subsequent orders processed at a rate of two plants per week. We have initiated steps to purchase the equipment. After receipt of the equipment at the plant site, we anticipate having the system installed and operable within three weeks. Therefore, it is estimated that it will take a minimum of nine weeks to have an operable system after GE receives our order.

In the interim, until this instrumentation modification is completed, a program is being established to daily monitor the SDV for both units (required only when a unit is operating) by means of portable ultrasonic testing equipment. It is anticipated that this program will be started by August 22, 1980 and will be continued until the GE monitoring system is operable.

Very truly yours,



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

COMMONWEALTH OF PENNSYLVANIA :

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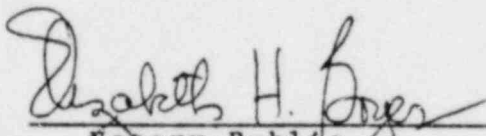
COUNTY OF PHILADELPHIA :

S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company; that he has read the foregoing response to IE Bulletin 80-17, Supplement 1 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 19th day
of August, 1980



Notary Public
ELIZABETH H. BOYER
Notary Public, Phila., Phila. Co.
My Commission Expires Jan. 30, 1982