

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

November 30, 1989

Docket Nos. 50-277
50-278
50-352
50-353

License Nos. DPR-44
DPR-56
NPF-39
NPF-85

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Limerick Generating Station, Units 1 and 2
Response to Generic Letter 89-21, "Request For Information
Concerning Status Of Implementation Of Unresolved Safety
Issue (USI) Requirements"

Gentlemen:

Enclosed is Philadelphia Electric Company's response to the
subject Generic Letter for Limerick Generating Station (Enclosures 1
and 2) and Peach Bottom Atomic Power Station (Enclosures 3 and 4).
This provides an update on the status of USI requirements
implementation in accordance with the instructions of the Generic
Letter.

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

Very truly yours,

G. A. Hunger, Jr.

G. A. Hunger, Jr.
Director-Licensing
Nuclear Services Department

8912130344 891130
PDR ADOCK 05000277
P PNU

Enclosures

cc: W. T. Russell, Administrator, Region I, USNRC
J. J. Lyash, USNRC Senior Resident Inspector, PBAPS
T. J. Kenny, USNRC Senior Resident Inspector, LGS

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UNRESOLVED SAFETY ISSUES FOR WHICH A FINAL TECHNICAL RESOLUTION HAS BEEN ACHIEVED

| <u>USI/MPA NUMBER</u> | <u>TITLE</u> | <u>REF. DOCUMENT</u> | <u>APPLICABILITY</u> | <u>STATUS/DATE*</u> | <u>REMARKS</u> |
|-----------------------|--|--|----------------------|---------------------|----------------|
| A-1 | Water Hammer | SECY 84-119 NUREG-0927, Rev. 1 NUREG-0993, Rev. 1 NUREG-0737 Item I.A.2.3 SRP revisions | All | NC | |
| A-2/ MPA D-10 | Asymmetric Blowdown Loads on Reactor Primary Coolant Systems | NUREG-0609 GL 84-04, GDC-4 | PWR | NA | Not a PWR |
| A-3 | Westinghouse Steam Generator Tube Integrity | NUREG-0844 SECY 86-97 SECY 88-272 GL 85-02 (No requirements) | W-PWR | NA | Not a PWR |
| A-4 | CE Steam Generator Tube Integrity | NUREG-0844, SECY 86-97 SECY 88-272 GL 85-02 (No requirements) | CE-PWR | NA | Not a PWR |
| A-5 | B&W Steam Generator Tube Integrity | NUREG-0844, SECY 86-97 SECY 88-272 GL 85-02 (No Requirements) | B&W-PWR | NA | Not a PWR |
| E A-6 | Mark I Containment Short-Term Program | NUREG-0408 | Mark I-BWR | NA | Not a Mark I |

* C - COMPLETE

NC - NO CHANGES NECESSARY

NA - NOT APPLICABLE

I - INCOMPLETE

E - EVALUATING ACTIONS REQUIRED

** See Enclosure 2

| <u>UST/MPA NUMBER</u> | <u>TITLE</u> | <u>REF. DOCUMENT</u> | <u>APPLICABILITY</u> | <u>STATUS/DATE*</u> | <u>REMARKS</u> |
|---------------------------|--|--|----------------------|------------------------------|----------------|
| A-7/ D-01 | Mark I Long-Term Program | NUREG-0661 NUREG-0661 Suppl. 1 GL 79-57 | Mark I-BWR | NA | Not a Mark I |
| A-8 | Mark II Containment Pool Dynamic Loads | NUREG-0808 NUREG-0487, Suppl. 1/2 NUREG-0802 SRP 6.2.1.1C GDC 16 | Mark II-BWR | NC | |
| A-9 | Anticipated Transients Without Scram | NUREG-0460, Vol. 4 10 CFR 50.62 | All | Unit 1: C 6/89 Unit 2: NC | ** |
| A-10/ MPA B-25 | BWR Feedwater Nozzle Cracking | NUREG-0619 Letter from DG Eisenhut dated 11/13/80 GL 81-11 | BWR | NC | |
| A-11 | Reactor Vessel Material Toughness | NUREG-0744, Rev. 1 10 CFR 50.60/ 82-26 | All | NC | |
| A-12 | Fracture Toughness of Steam Generator and Reactor Coolant Pump Supports | NUREG-0577, Rev. 1 SRP Revision 5.3.4 | PWP | NA | Not a PWR |
| A-17 | Systems Interactions | Ltr: DeYoung to licensees - 9/77 NUREG-1174, NUREG- 1229, NUREG/CR-3922, NUREG/CR-4261, NUREG/ CR-4470, GL 89-18 (No requirements) | All | NC | ** |
| A-24/ MPA B-60 | Qualification of Class IE Safety-Related Equipment | NUREG-0588, Rev. 1 SRP 3.11 10 CFR 50.49 GL 82-09, GL 84-24 GL 85-15 | All | Unit 1: C 3/85 Unit 2: NC | ** |

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|---------------------------|---|---|-------------------------|--|----------------|
| A-26/ MPA B-04 | Reactor Vessel Pressure Transient Protection | DOP Letters to Licensees B/76 NUREG-0224 NUREG-0371 SRP 5.2 GL 88-11 | PWR | NA | Not a PWR |
| A-31 | Residual Heat Removal Shutdown Requirements | NUREG-0606 RG 1.113, RG 1.139 SRP 5.4.7 | All OLS After 01/79. | NC | |
| A-36/ C-10, C-15 | Control of Heavy Loads Near Spent Fuel | NUREG-0612 SRP 9.1.5 GL 81-07, GL 83-42, GL 85-11 Letter from DG Eisenhut dated 12/22/80 | All | Unit 1: C 5/85 Unit 2: NC | ** |
| A-39 | Determination of SRV Pool Dynamic Loads and Pressure Transients | NUREG-0802 NUREGs-0763,0783,0802 NUREG-0661 SPP 6.2.1.1.C | BWR | NC | |
| A-40 | Seismic Design Criteria | SRP Revisions, NUREG/ CR-4776, NUREG/CR-C054, NUREG/CR-3480, NUREG/ CR-1582, NUREG/CR-1161, NUREG-1233, NUREG-4776 NUREG/CR-3805 NUREG/CR-5347 NUREG/CR-3509 | All | NC | |
| A-42/ MPA B-05 | Pipe Cracks in Boiling Water Reactors | NUREG-0313, Rev. 1 NUREG-0313, Rev. 2 GL 81-03, GL 88-01 | BWR | Unit 1: C 5/89 Unit 2: I Projected: 7/91 | ** |

| <u>USI/MPA NUMBER</u> | <u>TITLE</u> | <u>REF. DOCUMENT</u> | <u>APPLICABILITY</u> | <u>STATUS/DATE*</u> | <u>REMARKS</u> |
|-----------------------|---|---|--|---|-----------------------------|
| A-43 | Containment Emergency Sump Performance | NUREG-0510, NUREG-0869, Rev. 1 NUREG-0897, R.G.1.82 (Rev. 0), SRP 6.2.2 GL 85-22 No Requirements | All | NC | |
| A-44 | Station Blackout | RG 1.155 NUREG-1032 NUREG-1109 10 CFR 50.63 | All | I Projected: 4/91 | ** |
| A-45 | Shutdown Decay Heat Removal Requirements | SECY 88-260 NUREG-1289 NUREG/CR-5230 SECY 88-260 (No requirements) | All | I Projected: 7/92 | Covered by IPE |
| A-46 | Seismic Qualification of Equipment in Operating Plants | NUREG-1030 NUREG-1211/ GL 87-02, GL 87-03 | All | NA | ** |
| A-47 | Safety Implication of Control Systems | NUREG-1217, NUREG-1218 GL 89-19 | All | E | GL 89-19 Response, due 3/90 |
| A-48 | Hydrogen Control Measures and Effects of Hydrogen Burns on Safety Equipment | 10 CFR 50.44 SECY 89-122 | All, except PWRs with large dry containments | Unit 1: C Unit 2: I Projected: 2/90 | ** |
| A-49 | Pressurized Thermal Shock | PGs 1.154, 1.99 SECY 82-465 SECY 83-288 SECY 81-687 10 CFR 50.61/ GL 88-11 | PWR | NA | Not a PWR |

LGS REMARKS

- A-9: See Unit 1 License Amendment No. 22.
- A-17: IPE is expected to address internal flooding scenarios.
- A-24: See Unit 1 License Condition No. 5.
- A-36: See Unit 1 License Condition No. 19.
- A-42: See Generic Letter 88-01 Response dated 8/2/88. LGS Unit 2 In-Service Inspection (ISI) program revision is scheduled to be completed during the next refueling outage.
- A-44: See Rule Response dated 4/17/89. No modifications are needed. Procedure revisions will be complete within one year of NRC notification.
- A-46: See FSAR and NRC SER Section 3.10. Originally reviewed to IEEE 344-1975 requirements.
- A-48: See FSAR and NRC SER Section 6.2.5. See Unit 2 Exemption from 10 CFR 50.44 in License Condition 2.D(e).

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| A-2/ MPA D-10 | Asymmetric Blowdown Loads on Reactor Primary Coolant Systems | NUREG-0609 GL 84-04, GDC-4 | PWR | NA | Not a PWR |
| A-3 | Westinghouse Steam Generator Tube Integrity | NUREG-0844 SECY 86-97 SECY 88-272 GL 85-02 (No requirements) | W-PWR | NA | Not a PWR |
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| A-5 | B&W Steam Generator Tube Integrity | NUREG-0844, SECY 86-97 SECY 88-272 GL 85-02 (No Requirements) | B&W-PWR | NA | Not a PWR |
| E A-6 | Mark I Containment Short-Term Program | NUREG-0408 | Mark I-BWR | C 12/76 | ** |

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** See Enclosure 4

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|---------------------------|--|--|----------------------|--|----------------|
| A-7/ D-01 | Mark I Long-Term Program | NUREG-0661 NUREG-0661 Suppl. 1 GL 79-57 | Mark I-BWR | C Unit 2: 4/89 Unit 3: 6/87 | ** |
| A-8 | Mark II Containment Pool Dynamic Loads | NUREG-0808 NUREG-0487, Suppl. 1/2 NUREG-0802 SRP 6.2.1.1C GDC 16 | Mark II-BWR | NA | Not a Mark II |
| A-9 | Anticipated Transients Without Scram | NUREG-0460, Vol. 4 10 CFR 50.62 | All | C (mods installed) Unit 2: 3/89 Unit 3: 9/89 | ** |
| A-10/ MPA B-25 | BWR Feedwater Nozzle Cracking | NUREG-0619 Letter from DG Eisenhut dated 11/13/80 GL 81-11 | BWR | C 8/81 | |
| A-11 | Reactor Vessel Material Toughness | NUREG-0744, Rev. 1 10 CFR 50.60/ 82-26 | All | NA | ** |
| A-12 | Fracture Toughness of Steam Generator and Reactor Coolant Pump Supports | NUREG-0577, Rev. 1 SRP Revision 5.3.4 | PWP | NA | Not a PWR |
| A-17 | Systems Interactions | Ltr: DeYoung to licensees - 9/77 NUREG-1174, NUREG- 1229, NUREG/CR-3922, NUREG/CR-4261, NUREG/ CR-4470, GL 89-18 (No requirements) | All | C 1/81 | ** |
| A-24/ MPA B-60 | Qualification of Class IE Safety-Related Equipment | NUREG-0588, Rev. 1 SRP 3.11 10 CFR 50.49 GL 82-09, GL 84-24 GL 85-15 | All | C Unit 2: 12/85 Unit 3: 11/85 | |

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| A-31 | Residual Heat Removal Shutdown Requirements | NUREG-0606 RG 1.113, RG 1.139 SRP 5.4.7 | All OLS After 01/79. | NA | OL prior to 01/79 |
| A-36/ C-10, C-15 | Control of Heavy Loads Near Spent Fuel | NUREG-0612 SRP 9.1.5 GL 81-07, GL 83-42, GL 85-11 Letter from DG Eisenhut dated 12/22/80 | All | C 2/86 | ** |
| A-39 | Determination of SRV Pool Dynamic Loads and Pressure Transients | NUREG-0802 NUREGs-0763, 0783, 0802 NUREG-0661 SPP 6.2.1.1.C | BWR | NA | ** |
| A-40 | Seismic Design Criteria | SRP Revisions, NUREG/ CR-4776, NUREG/CR-0054, NUREG/CR-3480, NUREG/ CR-1582, NUREG/CR-1161, NUREG-1233, NUREG-4776 NUREG/CR-3805 NUREG/CR-5347 NUREG/CR-3509 | All | NA | ** |
| A-42/ MPA B-05 | Pipe Cracks in Boiling Water Reactors | NUREG-0313, Rev. 1 NUREG-0313, Rev. 2 GL 81-03, GL 88-01 | BWR | I Projected: Unit 2: 4/91 Unit 3: 12/91 | ** |

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| A-44 | Station Blackout | RG 1.155 NUREG-1032 NUREG-1109 10 CFR 50.63 | All | I Projected: 4/91 | ** |
| A-45 | Shutdown Decay Heat Removal Requirements | SECY 88-266 NUREG-1289 NUREG/CR-5230 SECY 88-260 (No requirements) | All | I Projected: 9/92 | Covered by IPE |
| A-46 | Seismic Qualification of Equipment in Operating Plants | NUREG-1030 NUREG-1211/ GL 87-02, GL 87-03 | All | I Projected: Unit 2: 4/91 Unit 3: 11/91 | ** |
| A-47 | Safety Implication of Control Systems | NUREG-1217, NUREG- 1218 GL 89-19 | All | E | GL 89-19 Response due 3/90 |
| A-48 | Hydrogen Control Measures and Effects of Hydrogen Burns on Safety Equipment | 10 CFR 50.44 SECY 89-122 | All, except PWRs with large dry containments | NC | ** |
| A-49 | Pressurized Thermal Shock | PGs 1.154, 1.99 SECY 82-465 SECY 83-288 SECY 81-687 10 CFR 50.61/ GL 88-11 | PWR | NA | Not a PWR |

PBAPS REMARKS

- A-1: The majority of features recommended in Section 2.5.1 of NUREG-0927 are employed at Peach Bottom.
- A-6: See UFSAR, Appendix M, paragraph M.3.5.
- A-7: See 3/18/87 letter, PECO to NRC, regarding modifications completion schedule.
- A-9: See 4/21/89 letter, PECO to NRC, regarding ARI function time.
- A-11: Charpy Upper Shelf Energy > 50 ft-lbs.
- A-17: See Response (received by NRC 9/1/72) to 8/4/72 NRC letter regarding internal flooding. IPE is also expected to address internal flooding scenarios. NUREG-0737 Item I.C.5 has been implemented since January 1981.
- A-36: See 2/11/86 Response to Generic Letter 85-11.
- A-39: Mark I Containments are covered by USI A-7.
- A-40: Construction Permit prior to 1972, thus, covered by USI A-46 (vertical tanks).
- A-42: See Generic Letter 88-01 Response dated 8/2/88. Pipe replacements at PBAPS, Units 2 and 3, are tentatively scheduled to be completed during the next refueling outage for each unit.
- A-43: See 5/29/87 letter, PECO to NRC, regarding piping replacement modifications. Modifications performed since issuance of Revision 1 to Reg. Guide 1.82 have conformed to Revision 1. Company has initiated programmatic changes to ensure future conformance to Revision 1 to Reg. Guide 1.82.
- A-44: See Rule Response dated 4/17/89. No modifications are needed. Procedure revisions will be complete within one year of NRC notification.
- A-46: Projected implementation dates provided are the scheduled dates of plant walk-downs per the SQUG GIP once the GIP is approved by the NRC.
- A-48: See 6/26/85 NRC SER.