PHILADELPHIA ELECTRIC COMPANY 2301 MARKET STREET P.O. BOX 3699 PHILADELPHIA, PA. 19101 JOSEPH W. GALLAGHER MANAGER ELECTRIC PRODUCTION DEPARTMENT (215) 841-5003 October 24, 1930 Re: Docket Nos. 50-277 50-278 Mr. Darrell G. Eisenhut, Director Division of Licensing U.S. Nuclear Regulatory Comuission Washington, DC 20555 Dear Mr. Eisenhut: This letter is in response to your letter to All BWR Licensees dated October 1, 1980 which concerns BWR scram systems. Philadelphia Electric Company is a member of the BWR Owners Group and is participating in the Sub-Group which is addressing the long-term scram system reliability. This participation consists of review of and comment on the criteria being developed, and attendance of selected meetings. Our response to the three specific items contained in your letter are as follows: The results of any reassessment of your present scram system to confirm conformance with the General Design Criteria (Appendix A to 10 CFR 50). Response We have reassessed our present scram discharge and instrument volumes and find the design to be in accordance with the General Design Criteria in Appendix A to 10 CFR 50. 8010280423

2) Whether you intend to reevaluate your present scram system and modify it as necessary to meet the additional design and performance criteria developed by the Owners Sub-Group. If not, what criteria will be used to judge the adequacy of your present scram system?

Response

We will reevaluate our present scram system against the design and performance criteria developed by the BVR Owners Group when it becomes available. At this time we expect our evaluation and modifications to be in concert with the criteria presently under development by the Owners Group.

3) Whether you intend to provide by December 15, 1980, the results of the above reevaluation (including required modifications) along with a schedule for implementation. If not, why not.

Response

The results of this evaluation, including any proposed modifications, and a schedule for implementation will be submitted to the NRC by December 15, 1980, contingent upon the timely publication of the BWR Owners Group criteria.

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

Very truly yours,

Ju bulleyher

COMMONWEALTH OF PENNSYLVANIA :

SS.

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 the letter from Darrell G. Eisenhut dated October 1, 1980 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.

Ju Golleyher

Subscribed and sworn to before me this day

Notary Public