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September 4, 1981

Re: Docket Nos. 50-277
50-278



Mr. Darrell C. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Schedule Relief for Several NRC Required
Modifications on Peach Bottom Unit 2

Dear Mr. Eisenhut:

This letter requests adjustments in the implementation schedules, established by the NRC for several refinements in the design of the Peach Bottom Atomic Power Station, in order to minimize the cost of electrical power to area customers. Specifically, we are requesting an extension in the January, 1982, implementation schedule to permit certain Peach Bottom Unit 2 modifications to be implemented during the refueling outage presently scheduled to commence on February 20, 1982. One of the schedule adjustments will require a revision to an "Order for Modification of Licenses and Grant of Extension of Exceptions for the Peach Bottom Atomic Power Station", issued January 13, 1981. The request applies to the following requirements and involves Peach Bottom Unit 2 only.

1. Use ODDYN code to recalculate pressurization transients for BWRs operating beyond January, 1982 (letter dated November 4, 1980, D. G. Eisenhut, NRC to All Operating Licensees).
2. NUREG-0737, Post TMI-Requirements, requires implementation by January 1, 1982 of certain changes in the facility design

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that would enhance accident response. The requested schedule revision applies to certain commitments identified in a letter dated December 22, 1980, S. L. Daltroff, Philadelphia Electric Company, to D. G. Eisenhut, NRC. These commitments involve modifications for which a plant outage is required and are discussed in more detail later in this letter.

3. A letter dated January 13, 1981, Robert W. Reid, NRC, to E. G. Bauer, Jr., Philadelphia Electric Company, transmitted an order for modifications of the license. The order required containment modifications for suppression pool hydrodynamic loading conditions that conform with Appendix A to NUREG-0661 by January 31, 1982. The requested schedule revision applies to only several of the required modifications and is discussed in more detail later in this letter.

The requested schedule adjustment would delay implementation of the aforementioned design modifications by less than two months and delay implementation of the ODYN code by less than one month. The schedule adjustment would permit the design modifications to be implemented concurrent with the scheduled refueling outage, thereby eliminating the economic penalty to area customers especially during the winter period when electricity demand and replacement energy costs are expected to be high.

The intent of the modifications are to further enhance the safety margin associated with low probability events. Given the existing safety margin present in the current design, and since Unit 2 is expected to be in a power coastdown prior to its refueling, sufficient safety margin will exist to justify a short delay in the implementation schedule.

1. Pressurization Transients - ODYN Code

After January, 1982, all operating BWRs with General Electric safety analysis are required to have limiting transients recalculated with the ODYN code. The Peach Bottom Unit 3 safety analysis utilizes the ODYN code for the fuel cycle that will start in September, 1981. The requested schedule revision would delay implementation of this requirement on Unit 2 by approximately three weeks.

Performing another safety analysis for the last three weeks of operation on the current Unit 2 fuel cycle would not be practical, and would represent an additional strain on Philadelphia Electric's, as well as NRC's limited manpower resources. The expected power coastdown situation on Unit 2 during this period will further enhance the conservatism in the present safety analysis. The next Unit 2 fuel cycle will employ the ODYN code as required by the aforementioned November 4, 1980 NRC letter.

2. NUREG-0737, TMI-Related Requirements

The proposed schedule revision would delay implementation of the following modifications beyond the NUREG-0737 implementation schedule of January 1, 1982.

- II.B.3 Post Accident Sampling
- II.F.1(3) Containment High Range Radiation Monitor
- II.F.1(4) Containment High Range Pressure
- II.F.1(5) Suppression Chamber High Water Level
- II.F.2 Reactor Level Recorder
- II.K.3.22 RCIC Suction Transfer
- II.K.3.28 ADS Accumulator Qualification

These modifications are not required to correct identified deficiencies in the current Peach Bottom design. Rather, they are intended to either provide additional information that may be helpful in assessing low probability accidents, or provide further refinement of the existing conservatism in the plant emergency response system. Additionally, manual procedures and techniques are currently in effect for post accident sampling and RCIC suction transfer capabilities. If an opportunity occurs as a result of a prolonged forced outage, we will endeavor to complete these modifications before January 1, 1982. Otherwise, based on the nature of these improvements, we believe a short delay in their implementation is appropriate.

3. Containment Suppression Chamber Modifications

The modification work involves bringing the containment structures into compliance with ASME code allowable stresses when reanalyzed for newly identified hydrodynamic loads. The Unit 3 modifications were completed during the recently concluded refueling outage except for the installation of

additional supports on torus attached piping systems which we expect to complete by January 31, 1982. The majority of the planned improvements on the Unit 2 containment structure were completed during the 1980 refueling outage. The requested schedule revision would delay implementation of the remaining improvements by approximately three weeks until February 20, 1982. The modifications completed to date on Unit 2 are as follows:

- a. Quenchers on MSRV discharge lines
- b. MSRV discharge line vacuum relief valves
- c. Vent header deflectors
- d. Downcomer supports
- e. Elbows and pipe supports on RHR return lines.

The remaining modifications for which schedule relief is requested involve the following tasks:

- a. Install additional snubbers on the MSRV discharge lines in the drywell.
- b. Modify torus internal structures such as the catwalk, monorail, spray header, vacuum breaker penetrations and drain lines, miscellaneous pipe penetrations in the suppression pool, and the stiffening of the vent header-to-downcomer intersection.
- c. Install torus shell stiffeners.
- d. Install torus tiedown system.
- e. Stiffen the exterior of torus shell at pipe penetration nozzles and install additional supports on external attached piping system.
- f. Torus water temperature monitoring system.

We plan to proceed with any torus modification work, such as item d and part of item e, that can be implemented prior to the start of the outage. The remaining torus modifications will be completed during the outage.

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For reasons previously expressed in this letter, we are requesting a revision in the schedule for Unit 2 modifications identified herein to permit their implementation on the upcoming refueling outage scheduled to commence on February 20, 1982. Should you have any questions regarding this matter, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "A. G. ...", is written in dark ink on the page.