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PHILADELPHIA ELECTRIC COMPANY
Peach Bottom Atomic Power Station
Delta, Pennsylvania
17314

October 21, 1980

Mr. Boyce H. Grier
Office of Inspection and Enforcement
Region 1
United States Nuclear Regulatory Commission
633 Park Avenue
King of Prussia, PA 19406

SUBJECT: REPORTABLE OCCURRENCE - PROMPT NOTIFICATION

Confirming Jack Winzenried's conversation with Mr. Cowgill on October 21, 1980.

Reference: Docket No. 50-277/278
Peach Bottom Units 2 and 3
Technical Specification Reference: 3.7.B

Report No. : 2-80-24/1P
Occurrence Date: October 20, 1980

Identification of Occurrence:

During an Engineering & Research Department design review of the Limerick Generating Station Standby Gas Treatment System, the Peach Bottom SBGTS design was reviewed for comparison. It was found that the instrument air piping to the moisture controller is not seismically qualified. The moisture controller turns the heater on and off to lower the relative humidity which will maintain the Iodine filter efficiency above 95%. Further review of the moisture control system is continuing.

Conditions Prior to Occurrence:

Unit 2 operating at full power. Unit 3 shut down and cooled down for maintenance outage.

Apparent Cause of Occurrence:

The original design specification for the system did not specify seismic qualification requirements.

Analysis of Occurrence:

The SBGTS operates during primary and secondary containment isolation conditions to process building exhaust. The heater in the SBGTS is automatically controlled by a moisture controller to reduce the relative humidity. At extremely high humidities, near 100%, the methol iodine removal efficiency is decreased. In the unlikely event of a design basis earthquake with the failure of the instrument air supply and a LOCA followed by the decision to vent the contents of the primary containment via the SBGTS, the methol iodine removal efficiency could be lowered on the order of 15%, assuming no dilution air flow from the secondary containment.

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Corrective Actions:

A jumper has been installed which bypasses the moisture control contacts. Thus, the heater will operate under the control of the installed temperature controller which is in series with the moisture control contacts. Operators have been instructed to manually turn the heater on during any operation with flow through the SCOTS system. This maintains the system in the operable status.

A modification to provide a seismically qualified air supply has been initiated.

Previous Failures:

None previous.

Very truly yours,



W. F. Ulrich
Station Superintendent

WUH:cat