

JANUARY 21 1982

DISTRIBUTION:

Docket File

NRC PDR

L PDR

Dockets Nos. 50-277  
and 50-270

TERA  
NSIC  
ORB#4 Rdg  
Deisenhut  
OELD  
AEOD  
IE-3  
ACRS-10  
Gray File-2

MFairtile  
Ringram  
KEccleston

Mr. Edward G. Bauer, Jr.  
Vice President and General Counsel  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101



Dear Mr. Bauer:

The Philadelphia Electric Company letter of December 21, 1981 requested that testing of the scram discharge system instrument volume level switches be discontinued upon completion of the piping modifications between the scram discharge volume and the instrument volume and the relocation of the level switch sensing lines. These modifications do contribute more reliability to the Peach Bottom Station scram systems and in particular increase reliability of the level switches and improve hydraulic coupling.

We do not agree with you that level switch testing may be discontinued because of the modifications. Our position is stated in Item 4.2.4.3 of the BMR Scram Discharge System Safety Evaluation dated December 1, 1980. Item 4.2.4.3 (Design Criterion 3) required both modifications and functional testing of the level switches (using water) after each scram.

Therefore, based on Item 4.2.4.3, we conclude that functional testing of the level switches after each scram must continue. You may request a reevaluation of our position after sufficient operating experience with the modified system has been obtained.

Sincerely,  
ORIGINAL SIGNED BY  
JOHN F. STOLZ

John F. Stolz, Chief  
Operating Reactors Branch #4  
Division of Licensing

cc:  
See next page

8202100155 820121  
PDR ADOCK 05000277  
P PDR

\*See previous 318 for concurrence.

OFFICE	ORB#4:DL	ORB#2:DL	C-ORB#4:DL				
SURNAME	MFairtile	KEccleston*	JStolz				
DATE	1/21/82:cb	1/20/82	1/21/82				
	MBJ						

Dockets Nos. 50-277  
and 50-278

Mr. Edward G. Bauer, Jr.  
Vice President and General  
Counsel  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

DISTRIBUTION

Docket File  
NRC PDR  
L PDR  
TERA  
NSIC  
ORB#4 Rdg  
DEisenhut  
OELD  
AEOD  
IE-3  
ACRS-10  
MFairtile  
RIngram  
Gray File  
KEccleston

Dear Mr. Bauer:

The Philadelphia Electric Company letter of December 21, 1981 requested that testing of the scram discharge system instrument volume level switches be discontinued upon completion of the piping modifications between the scram discharge volume and the instrument volume and the relocation of the level switch sensing lines. These modifications do contribute more reliability to the Peach Bottom Station scram systems and in particular increase reliability of the level switches and improve hydraulic coupling.

We do not agree with you that level switch testing may be discontinued because of the modifications. Our position is stated in Item 4.2.4.3 of the BWR Scram Discharge System Safety Evaluation dated December 1, 1981. Item 4.2.4.3 (Design Criterion 3) required both the modifications and functional testing of the level switches (using water) after each scram.

Therefore, based on Item 4.2.4.3, we conclude that functional testing of the level switches after each scram must continue. You may request a reevaluation of our position after sufficient operating experience with the modified system has been obtained.

Sincerely,,

John F. Stolz, Chief  
Operating Reactors Branch #4  
Division of Licensing

cc: See next page

OFFICE	MBF ORB#4:DL	ORB#2:DL	C-ORB#4:DL				
SURNAME	MFairtile;cf	KEccleston	JStolz				
DATE	1/27/82	1/20/82	1/ /82				