Mr. George A. Hunger, Jr.
Director-Licensing, MC 52A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Hunger:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON SAFER/GESTR LOSS OF COOLANT ACCIDENT METHODOLOGY, PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3, (TAC NOS. M86132 AND M86133)

By letter dated April 7, 1993, Philadelphia Electric Company (PECo) submitted General Electric (GE) proprietary report NEDC-32163P, "Peach Bottom Atomic Power Station, Units 2 and 3, SAFER/GESTR-LOCA Loss-of-Coolant Accident Analysis," dated January 1993. The GE report is cited as a reference in PECo's April 1, 1993 application to revise the Peach Bottom Technical Specification. In the April 1, 1993 submittal, PECo proposed chang sto implement an expanded operating domain for Peach Bottom Atomic Power Station.

The NRC staff has made a preliminary review of NEDC-32163P and determined that it does not appear to meet the requirements for applying the generic SAFER/GESTR methodology on a plant-specific basis. The staff's concerns are detailed in the enclosed request for additional information. PECo is requested to respond to the enclosed RAI within 30 days from receipt of this letter. This requirement affects 9 or fewer respondents and therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely, /S/ Joseph W. Shea, Project Manager Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

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Enclosure: Request for Additional Information

cc w/enclosure: See next page

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## UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

June 22, 1993

Docket Nos. 50-277 and 50-278

Mr. George A. Hunger, Jr.
Director-Licensing, MC 52A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Hunger:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON SAFER/GESTR LOSS OF COOLANT

ACCIDENT METHODOLOGY, PEACH BOTTOM ATOMIC POWER STATION, UNITS 2

AND 3, (TAC NOS. M86132 AND M86133)

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The NRC staff has made a preliminary review of NEDC-32163P and determined that it does not appear to meet the requirements for applying the generic SAFER/GESTR methodology on a plant-specific basis. The staff's concerns are detailed in the enclosed request for additional information. PECo is requested to respond to the enclosed RAI within 30 days from receipt of this letter. This requirement affects 9 or fewer respondents and therefore, is not subject to Office of Management at Budget review under P.L. 96-511.

Sincerely.

Joseph W. Shea, Project Manager

Project Directorate I-2

Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosure: Request for Additional Information

cc w/enclosure: See next page

## PEACH BOTTOM ATOMIC POWER STATION (PBAPS), UNITS 2 AND 3 SAFER/GESTR-LOCA METHODOLOGY

1. Results of break calculations presented as a plot of PCT vs. break size in Figure 5-1 of NEDC-32163P, "Peach Bottom Atomic Power Station, Units 2 and 3, SAFER/GESTR-LOCA Loss-of-Coolant Analysis," are noticeably different from the generic BWR 4 break spectrum (Figure 3.3 of NEDE-23785-1-PA, "The GESTR-LOCA and SAFER Models for the Evaluation of the Loss-of-Coolant Accident - Volume III"). The difference lies in the PCT results for small break LOCAs.

The nominally determined PCT versus break size curve for PBAPS indicates that the small break LOCA has a greater PCT than does the design basis accident (1051°F vs 1024°F). The justification presented for the PBAPS difference does not obviate the requirement set out in the original approval for SAFER/GESTR (TER dated June 1, 1984).

Approval for the use of the SAFER/GESTR method was based on conditions including confirmation that the plant-specific PCT calculations match the trend of the generic PCT vs break size curves. This is necessary to assure that the SAFER/GESTR model is applied in a manner that maintains the validity of the statistical model for plant-specific applications. The SAFER/GESTR PCT calculation results using "relaxed" ECCS parameters, as presented in NEDC-32163P, do not meet the requirements for the application of the SAFER/GESTR LOCA method.

Please provide additional or revised information concerning application of the SAFER/GESTR methodology to the Peach Bottom facility to address the above concerns.

Mr. George A. Hunger, Jr. Philadelphia Electric Company

Peach Bottom Atomic Power Station, Units 2 and 3

cc:

J. W. Durham, Sr., Esquire Sr. V.P. & General Counsel Philadelphia Electric Company 2301 Market Street, S26-1 Philadelphia, Pennsylvania 19101

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