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V. S. BOYER
SR. VICE PRESIDENT
NUCLEAR POWER

May 6, 1982

Mr. Harold R. Denton
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Implementation of ATWS Modifications at Peach Bottom Atomic Power Station, Units 2 & 3
Docket Nos. 50-277 & 50-278

Reference: Letter V. S. Boyer to H. R. Denton on Implementation of ATWS Mitigation Alternative 3A, dated March 31, 1980

Dear Mr. Denton:

In the referenced letter, Philadelphia Electric Company committed to installing ATWS modifications consistent with Alternate 3A, as discussed in Volume 4 (draft) of NUREG-0460, in Peach Bottom Atomic Power Station, Units 2 & 3. Our anticipated schedule for this effort included completion of design by December 1980 and installation based on equipment availability. This commitment was made assuming that the ATWS rulemaking would be completed in the near future, that this rulemaking would require Alternate 3A features and our desire to be responsive to the NRC on this issue. We have since reconsidered our commitment for the following reasons:

1.) The finalization of the ATWS rules has not taken place and at the present time there are two alternative rules under consideration. Therefore, it is not clear what will ultimately be required to resolve the ATWS issue.

2.) We remain convinced that prevention of ATWS is a sufficient solution.

3.) Peach Bottom has been selected by IDCOR as the Mark I reference plant and will be analyzed to study the effects of severe accidents.

As noted in the referenced letter, the Peach Bottom Units are already equipped with recirculation pump trip (RPT). At the present time we are proceeding with the design and installation of the alternate rod insertion system (ARI), redundant and diverse scram discharge volume level instrumentation, and logic modifications to reduce the number of isolation transients. We anticipate completion of design, procurement and material deliveries by mid-1983 with installation at the subsequent refueling outages on each Unit.

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We believe these modifications provide a sufficient solution to ATWS. We will await the results of the current rulemaking and the IDCOR study for further consideration of the requirements of any mitigation features.

Sincerely,

V. S. Boyer

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