

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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September 11, 1990

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Inservice Testing Program

REFERENCE: Letter from J. W. Gallagher (PECo) to
W. R. Butler (NRC) dated June 29, 1988

Dear Sir:

In the above referenced letter, Philadelphia Electric Company (PECo) submitted a revised second 10-year interval Inservice Testing (IST) Program for Peach Bottom Atomic Power Station, Units 2 and 3. This revised IST Program is currently under NRC review. The purpose of this letter is to supplement the referenced submittal.

Enclosed with this letter is Relief Request No. 10-VRR-2, Revised 9/90 and its associated valve table changes. This is a revision to Relief Request 10-VRR-2 which was included in the referenced submittal. This Relief Request concerns the Residual Heat Removal stay-fill supply check valves. The proposed alternate testing is to test the valves in pairs. The previously proposed alternate testing was to perform valve disassembly.

In the referenced submittal, we also provided Relief Requests 33-PRR-1 and 48-PRR-1. These requested relief from the flow measurement requirements for the Emergency Service Water (ESW) pumps, ESW booster pumps and Emergency Cooling Water pump until modifications can be completed to allow flowrates to be measured.

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An appropriate modification, common to both units, will be completed prior to startup from the next Unit 2 refueling outage; therefore, only schedular relief from performing flow measurement is requested. The current design for the proposed modification incorporates the use of ultrasonic testing. It is our understanding that this flow measuring technique, provided it meets applicable ASME code requirements, does not need a Relief Request.

If you have any questions concerning this request, please do not hesitate to call.

Very truly yours,

James A. Baillio for

G. A. Hunger, Jr.
Manager-Licensing
Nuclear Engineering & Services

Enclosure

cc: T. T. Martin, Administrator, Region I, USNRC
J. J. Lyash, USNRC Senior Resident Inspector

RELIEF REQUEST NO. 10-VRR-2, Revised 9/90

System: Residual Heat Removal (RHR)

Valve(s): CHK-2-10-063 CHK-3-10-063
 CHK-2-10-064 CHK-3-10-064
 CHK-2-10-183A,B CHK-3-10-183A,B
 CHK-2-10-184A,B CHK-3-10-184A,B

Category: C

Function: Residual Heat Removal/LPCI Stay-fill supply check valves.

Testing Requirement(s): Exercise in the reverse direction.

Basis for Relief: The above stay-fill check valves are installed in pairs (series arrangements) with no provisions for individual valve testing (ie CHK-10-063 & 064 are in series; CHK-10-183 & CHK-10-184 are in series). The valves function, in series as a pair, to prevent loss of RHR inventory to the stay-fill system in the event of a stay-fill system failure. Because testing these valves as a pair is preferable to valve disassembly and inspection, relief from testing individual valves is requested. In addition, Technical Specification 3.5.G requires that the discharge piping of the LPCI system be filled to prevent water hammer upon system initiation. Testing these valves during power operation would make the stay-fill system inoperable, requiring entry into the associated limiting condition for operation. For this reason, testing of the above pairs of valves will be performed at cold shutdowns.

Alternate Testing: Valves will be tested as a pair in the reverse direction at cold shutdown. Both valves in the pair will be considered inoperable if testing indicates the valves do not close on reverse flow.

1ST TABLE - VALVES
PEACH BOTTOM ATOMIC POWER STATION - UNIT # 2 & COMMON

PAGE NO. 77
DATE 07/24/90

SYSTEM: 10 RESIDUAL HEAT REMOVAL (RHR)

VALVE NUMBER	P&ID	COORD	VALVE CAT.	ACT/PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITIONS			APP. J TYPE C	TEST - FREQ. (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
AO-3-10-046A	M-361 (SHT 1)	F-4	A, C	A	24	TC	SA	C	OC	-	Y	ET-C(F&R), LJ-T, LP-T, PI-T	10-VCS-1, GVRR-1	PENT. N-13B
AO-3-10-046B	R-361 (SHT 2)	F-6	A, C	A	24	TC	SA	C	OC	-	Y	ET-C(F&R), LJ-T, LP-T, PI-T	10-VCS-1, GVRR-1	PENT. N-13A
AO-3-10-163A	M-361 (SHT 1)	E-4	A	P	1	GL	AO	C	C	C	Y	LJ-T, LP-T, PI-T	GVRR-1	PENT. N-13B
AO-3-10-163B	R-361 (SHT 2)	F-6	A	P	1	GL	AO	C	C	C	Y	LJ-T, LP-T, PI-T	GVRR-1	PENT. N-13A
CHK-3-10-019A	M-361 (SHT 1)	A-5	C	A	3	CK	SA	OC	OC	-	N	ET-Q(F), ET-R(R)	10-VRR-1	
CHK-3-10-019B	M-361 (SHT 2)	C-5	C	A	3	CK	SA	OC	OC	-	N	ET-Q(F), ET-R(R)	10-VRR-1	
CHK-3-10-019C	M-361 (SHT 1)	C-5	C	A	3	CK	SA	OC	OC	-	N	ET-Q(F), ET-R(R)	10-VRR-1	
CHK-3-10-019D	M-361 (SHT 2)	A-5	C	A	3	CK	SA	OC	OC	-	N	ET-Q(F), ET-R(R)	10-VRR-1	
CHK-3-10-048A	M-361 (SHT 1)	A-6	C	A	20	TC	SA	OC	OC	-	N	ET-Q(F&R)		
CHK-3-10-048B	M-361 (SHT 2)	C-4	C	A	20	TC	SA	OC	OC	-	N	ET-Q(F&R)		
CHK-3-10-048C	R-361 (SHT 1)	B-6	C	A	20	TC	SA	OC	OC	-	N	ET-Q(F&R)		
CHK-3-10-048D	M-361 (SHT 2)	A-4	C	A	20	TC	SA	OC	OC	-	N	ET-Q(F&R)		
CHK-3-10-064	M-361 (SHT 1)	G-5	C	A	2	CK	SA	OC	C	-	N	ET-C(R)	10-VRR-2	
CHK-3-10-184A	M-361 (SHT 1)	G-5	C	A	2	CK	SA	OC	C	-	N	ET-C(R)	10-VRR-2	
CHK-3-10-184B	M-361 (SHT 2)	G-4	C	A	2	CK	SA	OC	C	-	N	ET-C(R)	10-VRR-2	
MO-3-10-013A	R-361 (SHT 1)	B-4	B	A	24	GT	MO	O	OC	AI	N	ET-Q, ST-Q(O&C), PI-T		
MO-3-10-013B	M-361 (SHT 2)	C-6	B	A	24	GT	MO	O	OC	AI	N	ET-Q, ST-Q(O&C), PI-T		

1ST TABLE - VALVES
 PEACH BOTTOM ATOMIC POWER STATION - UNIT # 2 & COMMON

PAGE NO. 77A
 DATE 07/24/90

SYSTEM: 10 RESIDUAL HEAT REMOVAL (RHR)

VALVE NUMBER	P&ID	COORD	VALVE CAT.	ACT/ PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITIONS			APP. J TYPE C	TEST - FREQ. (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
CHK-2-10-063	M-361 (SHT 1)	G-5	C	A	2	CK	SA	OC	C	-	V	ET-C(R)	10-VRR-2	
CHK-2-10-183A	M-361 (SHT 1)	G-5	C	A	2	CA	SA	OC	C	-	N	ET-C(R)	10-VRR-2	
CHK-2-10-183B	M-361 (SHT 2)	G-4	C	A	2	CK	SA	OC	C	-	N	ET-C(R)	10-VRR-2	

1ST TABLE - VALVES
PEACH BOTTOM ATOMIC POWER STATION - UNIT # 3

PAGE NO. 77
DATE 07/24/90

SYSTEM: 10 RESIDUAL HEAT REMOVAL (RHR)

VALVE NUMBER	P&ID	COORD	VALVE CAT.	ACT/ PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITIONS			APP. J TYPE C	TEST - FREQ. (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
AO-3-10-046A	M-361 (SHT 3)	F-4	A, C	A	24	TC	SA	C	OC	-	Y	ET-C(F&R), LJ-T, LP-T, PI-T	10-VCS-1, GVRR-1	PENT. N-13B
AO-3-10-046B	M-361 (SHT 4)	F-6	A, C	A	24	TC	SA	C	OC	-	Y	ET-C(F&R), LJ-T, LP-T, PI-T	10-VCS-1, GVRR-1	PENT. N-13A
AO-3-10-163A	M-361 (SHT 3)	E-4	A	P	1	GL	AO	C	C	C	Y	LJ-T, LP-T, PI-T	GVRR-1	PENT. N-13B
AO-3-10-163B	M-361 (SHT 4)	F-6	A	P	1	GL	AO	C	C	C	Y	LJ-T, LP-T, PI-T	GVRR-1	PENT. N-13A
CHK-3-10-019A	M-361 (SHT 3)	A-5	C	A	3	CK	SA	OC	OC	-	N	ET-Q(F), ET-R(R)	10-VRR-1	
CHK-3-10-019B	M-361 (SHT 4)	C-5	C	A	3	CK	SA	OC	OC	-	N	ET-Q(F), ET-R(R)	10-VRR-1	
CHK-3-10-019C	M-361 (SHT 3)	C-5	C	A	3	CK	SA	OC	OC	-	N	ET-Q(F), ET-R(R)	10-VRR-1	
CHK-3-10-019D	M-361 (SHT 4)	A-5	C	A	3	CK	SA	OC	OC	-	N	ET-Q(F), ET-R(R)	10-VRR-1	
CHK-3-10-048A	M-361 (SHT 3)	A-6	C	A	20	TC	SA	OC	OC	-	N	ET-Q(F&R)		
CHK-3-10-048B	M-361 (SHT 4)	C-4	C	A	20	TC	SA	OC	OC	-	N	ET-Q(F&R)		
CHK-3-10-048C	M-361 (SHT 3)	B-6	C	A	20	TC	SA	OC	OC	-	N	ET-Q(F&R)		
CHK-3-10-048D	M-361 (SHT 4)	A-4	C	A	20	TC	SA	OC	OC	-	N	ET-Q(F&R)		
CHK-3-10-064	M-361 (SHT 3)	G-5	C	A	2	CK	SA	OC	C	-	N	ET-C(R)	10-VRR-2	
CHK-3-10-184A	M-361 (SHT 3)	G-5	C	A	2	CK	SA	OC	C	-	N	ET-C(R)	10-VRR-2	
CHK-3-10-184B	M-361 (SHT 4)	G-4	C	A	2	CK	SA	OC	C	-	N	ET-C(R)	10-VRR-2	
MO-3-10-013A	M-361 (SHT 3)	B-4	B	A	24	GT	MO	O	OC	AI	N	ET-Q, ST-Q(O&C), PI-T		
MO-3-10-013B	M-361 (SHT 4)	C-6	B	A	24	GT	MO	O	OC	AI	N	ET-Q, ST-Q(O&C),		

1ST TABLE - VALVES
PEACH BOTTOM ATOMIC POWER STATION - UNIT # 3

SYSTEM: 10 RESIDUAL HEAT REMOVAL (RHR)

VALVE NUMBER	P&ID	COORD	VALVE CAT.	ACT/PAS	SIZE	VALVE TYPE	ACT. TYPE	POSITIONS			APP. J TYPE	TEST - FREQ. (DIRECTION)	VRR/VCS NUMBER	REMARKS
								NRM	SAF	FAL				
CHK-3-10-063	M-361 (SHT 3)	G-5	C	A	2	OX	SA	OC	C	-	N	ET-C(R)	10-VRR-2	
CHK-3-10-183A	M-361 (SHT 3)	G-5	C	A	2	OX	SA	OC	C	-	N	ET-C(R)	10-VRR-2	
CHK-3-10-183B	M-361 (SHT 4)	G-4	C	A	2	OX	SA	OC	C	-	N	ET-C(R)	10-VRR-2	