PHILADELPHIA ELECTRIC COMPANY

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October 14, 1982

Mr. R. C. Haynes, Director
Office of Inspection and Enforcement
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

SUBJECT: Peach Bottom Battery and Emergency Switchgear Room Ventilation Systems Modification

Dear Mr. Haynes:

In a letter to you, dated April 13, 1981, we identified a potential problem with the ventilation system associated with our battery and emergency switchgear rooms. We indicated that we would notify you as soon as we developed a permanent modification and established an anticipated completion date. This letter will explain the potential problem, detail our solution and submit our schedule for completion of the necessary modifications.

The system consists of a common ventilation supply system and separate exhaust systems for the emergency switchgear and battery rooms. All ventilation systems for these rooms are installed in seismic Class I structures, however, it has been determined that the control air supply for the dampers associated with each supply and exhaust fan are not seismically qualified. The potential exists for these dampers to fail during a seismic event such that all forced air cooling to the battery and emergency switchgear rooms would be eliminated.

IE31
Add: M. Fairtile

Tne following dampers are affected:

PO-00019-1&2, PO-00020-1&2,
PO-00031-1&2, PO-00032-1&2,
PO-00025-1&2, PO-00026-1&2,
PO-00016

As a temporary measure, mechanical restraints have been installed on one complete flow path so that ventilation is maintained on loss of instrument air.

The pneumatic air supply will be upgraded to seismic Class I criteria. Seismically qualified bottled nitrogen will be provided for the pneumatic operators. The bottled air installation will allow continued operation of the required fan systems after a seismic event.

Supply for the pneumatic operators will be from a 2 bottle system provided with suitable pressure indicators, and control valves. One bottle will be used as required with the second as a backup. One bottle will provide 250 cubic feet of nitrogen or air. The 24 operators requiring a seismic air supply utilize .1 cubic feet per operations. Sufficient number of operator actions is provided by one bottle. The bottles and interconnecting tubing will be seismically restrained.

The outside air inlet damper is currently air controlled to provide a minimum outside air inlet flow. The damper will be provided with a mechanical stop to assure minimum fresh air intake. The minimum air flow setting of 18,200 CFM is sufficient to keep the safeguard rooms at or below their design maximum temperature.

The subject modification does not involve unreviewed safety questions since:

1. The probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.

2. The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created.

3. The margin of safety as defined in the basis for the Technical Specifications is not reduced.

These modifications are expected to be completed by December 31, 1982.

If you have any questions or require additional information, please don't hesitate to call.

Very truly yours,

M. J. Cooney
Superintendent
Generation Division - Nuclear

cc: Site Inspector
Peach Bottom