PHILADELPHIA ELECTRIC COMPANY

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JOSEPH W. GALLAGHER
MANAGER
ELECTRIC PRODUCTION DEPARTMENT

October 26, 1982

RE: Docket No. 50-277

Mr. John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Stolz:

This letter requests relief from our commitment made by letter from S. L. Daltroff, Vice President, Philadelphia Electric Company to Mr. T. A. Ippolito, Chief, Operating Reactors Branch 3, on December 11, 1979, with respect to containment purge and vent valve operation.

The commitment made in the December 11 letter was that the large diameter purge/vent valves on the Peach Bottom Units would not be used for containment purging and venting in excess of 90 hours per year with the reactor at power. We are making this request since we are within approximately 5 hours of that limit and feel that it is important to safety to be able to make an inspection in the drywell with the reactor system at approximately 500 psig. Because Unit 2 is in the beginning of start-up from a recent forced outage, we are requesting expedited relief from this commitment.

Your letter of July 7, 1982 to the Philadelphia Electric Company concerning the status of containment purging and venting, and completion of NUREG 0737, Item II.E.4.2, contained an enclosure (4) which addresses the use of the containment purge and venting valves beyond the 90 hours per year, under heading BTP-CSB 6.4 position B.4 amplification.

We have reviewed enclosure (4) with respect to item (2) and submit that the need for this additional purge/vent time is justified for safety purposes in that it will allow us to perform a visual inspection for steam leaks within the drywell as an added assurance of primary boundary integrity prior to full power operation.

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In support of this request, we offer the following information:

1. If a LOCA were to occur during the limited period of time that the containment purge and vent valves were open, the offsite doses resulting from the coolant/gas moisture escaping from the primary containment during the valve closure period (<5 seconds) would be substantially below 10CFR100 guidelines. Our analysis has included the assumption of an iodine spike resulting in coolant activity levels substantially in excess of Technical Specification limits

2. Adequate assurance of valve operability (closure) has been provided in our August 26, 1982 submittal to you on this subject.

3. As stated in point 16 of the Summary Report transmitted with the August 26 letter, duct or filter overpressure failures would not be expected with the purge valves in their present condition (i.e. - limited to <40 degrees open) and there would be no increase in risk above that predicted in WASH-1400.

4. The Operations and Safety Review Committee concurs with this request.

Based on the above, an extension of the annual purge limitation for PBAPS Unit 2 beyond 90 hours per year is justified from a safety viewpoint to allow an inspection in the drywell of the primary system during start-up at approximately 500 psig. We will continue to minimize our purging and venting at power as previously committed.

If you have any questions or require further information on this subject, please do not hesitate to contact us.

Very truly yours,

J. W. Gallagher

cc: Site Inspector
Peach Bottom