

OCT 07 1982

Dockets Nos. 50-277 & 50-278

Mr. Edward G. Bauer, Jr.
Vice President and General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

By letter dated August 24, 1982 we sent you a request for additional information concerning NUREG-0737 Item II.B.3 Post Accident Sampling System. There has been confusion concerning our request and the purpose of this letter is to provide some clarification. First, the requirements of this item are as described in NUREG-0737. The clarification section of our previous letter provides staff guidelines not requirements on how to meet the NUREG-0737 criteria.

Additional guidance concerning our initial letter is as follows:

1. NUREG-0737 states that the licensee should be able to perform sampling and analysis within 3 hours of deciding to take the sample. Our clarification section asks how the 3 hour limit is to be met during a loss of offsite power. It was not meant to imply that the sampling system had to be operational during a loss of offsite power. Rather the intent was if there is a loss of offsite power, can you meet the three hour limit.
2. Clarification 2(d) of our original request asked for a discussion of the reliability and maintenance information to demonstrate that the selected on-line instrument is appropriate for this application. A detailed reliability analysis is not required to satisfy the staff concerns in this area. The staff needs enough data to provide reasonable assurance that the on-line instrument will function when needed.
3. Clarification 3 of our original request discussed environmental qualification of certain valves. These valves should already be on the list of equipment that must be environmentally qualified by previous Commission Order. Therefore a statement that the valves are in the previously submitted environmental qualification program will satisfy staff concerns for this review.

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Mr. Edward G. Bauer, Jr.

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4. Clarification 6 requested information on the predicted man-rem exposures based on person-motion sampling, transport and analysis of all parameters. This information is necessary to confirm that the licensee has made adequate provisions to meet GDC 19 requirements.
5. Finally, several portions of the clarification section refer to Regulatory Guide 1.97 Revision 2. For purposes of this information request, Regulatory Guide 1.97 is recognized as a recommendation and not a requirement.

The above should resolve the present concerns in this area. If you have further questions please contact your assigned NRC Project Manager.

Sincerely,

***ORIGINAL SIGNED BY
JOHN F. STOLZ***

John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

cc: See next page

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