



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 17, 1991

Docket Nos. 50-277
and 50-278

Mr. George J. Beck
Director - Licensing, MC 5-2A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P. O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Beck:

SUBJECT: INSERVICE TESTING PROGRAM FOR PUMPS AND VALVES, PEACH BOTTOM ATOMIC
POWER STATION, UNITS 2 AND 3 (TAC NOS. 61189 AND 61190)

Pursuant to 10 CFR 50.55a(g), certain Class 1, 2, and 3 pumps and valves in water-cooled nuclear reactor facilities are required to meet the inservice testing requirements stated in the ASME Boiler and Pressure Vessel Code, Section XI; specifically, Subsection IWP, Inservice Testing of Pumps in Nuclear Power Plants, and Subsection IWV, Inservice Testing of Valves in Nuclear Power Plants. Each facility is required to establish a program for the inservice testing of pumps and valves which is updated every ten years to meet the requirements in the latest approved edition and addenda to Section XI of the ASME Code. The program is submitted to the NRC for review and approval of the relief requests.

By letters dated June 29, 1988 and September 11, 1990, the Philadelphia Electric Company submitted to the NRC the Inservice Testing (IST) Program and additional information for the second 10-year interval which commenced July 6, 1984 and December 13, 1984 for Units 2 and 3, respectively. The above cited submittals also requested relief for Peach Bottom Atomic Power Station, Units 2 and 3, from certain of the Section XI Code requirements.

As indicated in the enclosed Safety Evaluation (SE) and the supporting Technical Evaluation Report (TER) prepared by our contractor, EG&G Idaho, Inc., we have concluded that relief should be granted from the testing requirements which we have determined would be impractical to perform, where compliance would result in a hardship without a compensating increase in safety, or where the proposed alternative testing provides an acceptable level of quality and safety. The enclosed SE and TER provide the details of our review, and Table 1 to the SE provides a summary tabulation of our conclusions concerning each relief request.

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Mr. George J. Beck

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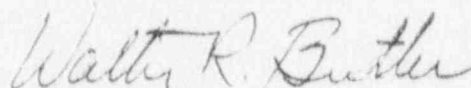
January 17, 1991

We have determined pursuant to 10 CFR 50.55a(a)(3)(i), 10 CFR 50.55a(a)(3)(ii), and 10 CFR 50.55a(g)(6)(i), for the items for which relief is requested that (1) the proposed alternatives would provide an acceptable level of quality and safety, (2) compliance with the specified requirements would result in hardship without a compensating increase in the level of quality and safety, or (3) code requirements are impractical and that the granting of the relief is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Accordingly, relief from certain requirements of Section XI of the ASME Code is hereby granted, as described in the enclosed Safety Evaluation, provided the omissions and inconsistencies identified in Appendix C of the TER are addressed within the time frame specified in the SE.

IST program changes such as additional relief requests or changes to relief requests should be submitted for staff review but should not be implemented prior to review and approval by the NRC. New or revised relief requests meeting the positions in Generic Letter 89-04, Attachment 1, can be implemented provided the guidance in Generic Letter 89-04, Section D, is followed. Program changes that involve additions or deletions of components from the IST program should be provided to the NRC.

Should you have any questions concerning the above, please do not hesitate to contact us.

Sincerely,



Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Safety Evaluation

cc w/enclosure:
See next page

January 17, 1991

We have determined pursuant to 10 CFR 50.55a(a)(3)(i), 10 CFR 50.55a(a)(3)(ii), and 10 CFR 50.55a(g)(6)(i), for the items for which relief is requested that (1) the proposed alternatives would provide an acceptable level of quality and safety, (2) compliance with the specified requirements would result in hardship without a compensating increase in the level of quality and safety, or (3) code requirements are impractical and that the granting of the relief is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Accordingly, relief from certain requirements of Section XI of the ASME Code is hereby granted, as described in the enclosed Safety Evaluation, provided the omissions and inconsistencies identified in Appendix C of the TER are addressed within the time frame specified in the SE.

IST program changes such as additional relief requests or changes to relief requests should be submitted for staff review but should not be implemented prior to review and approval by the NRC. New or revised relief requests meeting the positions in Generic Letter 89-04, Attachment 1, can be implemented provided the guidance in Generic Letter 89-04, Section D, is followed. Program changes that involve additions or deletions of components from the IST program should be provided to the NRC.

Should you have any questions concerning the above, please do not hesitate to contact us.

Sincerely,

/s/

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Safety Evaluation

cc w/enclosure:

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Mr. George J. Beck
Philadelphia Electric Company

Peach Bottom Atomic Power Station,
Units 2 and 3

cc:

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