

GL 89-19

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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January 29, 1991

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  
Additional Response to NRC Generic Letter 89-19,  
"Request for Action Related to Resolution of  
Unresolved Safety Issue A-47 Safety Implication  
of Control Systems in LWR Nuclear Power Plants"

REFERENCE: Letter from D. R. Helwig (PECo) to  
U.S. Nuclear Regulatory Commission  
dated March 20, 1990

Gentlemen:

Our response to Generic Letter 89-19 "Request for Action Related to Resolution of Unresolved Safety Issue A-47 Safety Implication of Control Systems in LWR Nuclear Power Plants" was provided in the above referenced letter. In that response, we described the capability of the existing design to trip the Reactor Feedwater Pump turbines on reactor high level by either 1) actuation of Feedwater Level Control relay 6A-K1 OR 2) actuation of High Pressure Coolant Injection (HPCI) relays 23A-K52 and 23A-K37. In the above referenced letter, we also committed to submit, by January 31, 1991, an appropriate Technical Specification Change Request (TSCR) to include requirements in the Technical Specifications (TS) for those specific relays and their associated contacts which provide vessel overfill protection but are not already addressed by the TS.

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The purpose of this letter is to withdraw our commitment to submit a TSCR. Instead, we will await the outcome of this issue in the Improved Technical Specifications (ITS). If the vessel overfill relays and contacts are not included in the final version of NRC-approved ITS, no further action with respect to a TSCR will be taken. If the relays and contacts which provide vessel overfill protection are included in the ITS, then we will include them in our request for an overall conversion to ITS for Peach Bottom. Because of the uncertainty of the NRC review schedule of the ITS, we cannot commit to a submittal date for this overall conversion at this time. We expect to provide the NRC with our ITS schedule by March 31, 1991, regardless of the outcome of the overfill protection issue.

The subject GL and our response also discussed short-term measures to be taken to ensure periodic verification and testing of the overfill protection system. In the above referenced letter, we committed to develop or revise, as necessary, appropriate plant procedures to implement the channel check, channel functional testing and channel calibration of the associated equipment prior to startup from the next refueling outage of Unit 2 (currently scheduled for end of March 1991). This commitment is unchanged. In fact, actions associated with performing a channel check are already complete.

We have concluded that although additional requirements for vessel overfill protection will not be included in the TS in the near term and possibly not even in the long term, verification and testing of the equipment will be ensured by implementation of the plant procedures being revised or developed. Further, it appears to be more efficient to defer the decision regarding inclusion of additional requirements in the TS rather than to include them now and later delete them.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

*J. Basilio for*

G. J. Beck  
Manager  
Licensing Section  
Nuclear Engineering & Services

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