



PECO ENERGY

PECO Energy Company
Nuclear Group Headquarters
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May 31, 1994

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
Request for Relief from Performing Complete Examination of Certain
Class 1 Integrally Welded Attachments (Relief Request No. RR-18)

Dear Sir:

Attached for your review and approval is Relief Request No. RR-18 for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, Second Ten-Year Interval Inservice Inspection (ISI) Program. Relief Request No. RR-18 requests relief from the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, 1980 Edition, requirement that 100% of the all welds connecting integral attachments to the reactor pressure vessel be examined using volumetric or surface examinations during the second ten-year ISI interval as specified in Subsection IWB-2500, Table IWB-2500-1. We are specifically requesting relief from performing a complete 100% examination of certain Class 1 integrally welded attachments to the reactor pressure vessel due to physical plant restrictions. The details and justification supporting this request are provided in the attached relief request.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

G. A. Hunger, Jr., Director
Licensing

Attachment

cc: T. T. Martin, Administrator, USNRC, Region I
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS

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ATTACHMENT

Peach Bottom Power Station

Units 2 and 3

Inservice Inspection Program

RELIEF REQUEST No. RR-18

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I. IDENTIFICATION OF COMPONENTS

ISI Class 1 Integrally Welded Attachments to the Reactor Pressure Vessel, Examination Category B-H, Item Number B8.10.

The specific Class 1 components affected by this relief request are detailed in Table RR-18-01.

II. CODE REQUIREMENTS FROM WHICH RELIEF IS REQUESTED

ASME Section XI, 1980 Edition, through the Winter 1981 Addenda, Code Category B-H, requires that 100% of the welds connecting all integral attachments to the Reactor Pressure Vessel be examined using the volumetric or surface examination methods. The required examinations shall be performed during the second inservice inspection interval in accordance with Table IWB-2500-1.

Relief is requested from performing a complete (100%) examination of certain Class 1 integrally welded attachments due to physical plant restrictions.

III. BASIS FOR RELIEF

The components requiring relief are detailed in Table RR-18-01. The subject welded attachments are the eight (8) Reactor Pressure Vessel Stabilizer Bars. Access to perform complete examinations of these attachments is physically restricted by the bioshield wall. Because the top of the shield wall is immediately adjacent to the underside of the stabilizer bar, access for examination of a portion of this region does not exist. Major plant modifications would be required to improve access and increase examination coverage. Included in Table RR-18-01 is the pertinent information relative to the extent of examination which has been, or is expected to be completed, along with the basis for the access restrictions.

IV. ALTERNATE PROVISIONS

Each of the Stabilizer Bars will be examined to the maximum extent possible, using the surface examination method. No alternate provisions are applicable in this situation.

Relief Request RR-18 (Contd)
TABLE RR-18-01

UNIT 2

<u>Component Identification</u>	<u>Description</u>	<u>Limiting Condition</u>	<u>Examination % Complete</u>
Support-1(IA)	Stabilizer Bar @ 0 Deg.	Bioshield	76%
Support-2(IA)	Stabilizer Bar @ 45 Deg.	Bioshield	76%
Support-3(IA)	Stabilizer Bar @ 90 Deg.	Bioshield	76%
Support-4(IA)	Stabilizer Bar @ 135 Deg.	Bioshield	76%
Support-5(IA)	Stabilizer Bar @ 180 Deg.	Bioshield	76%
Support-6(IA)	Stabilizer Bar @ 225 Deg.	Bioshield	76%
Support-7(IA)	Stabilizer Bar @ 270 Deg.	Bioshield	76%
Support-8(IA)	Stabilizer Bar @ 315 Deg.	Bioshield	76%

UNIT 3

<u>Component Identification</u>	<u>Description</u>	<u>Limiting Condition</u>	<u>Examination % Complete</u>
Support-1(IA)	Stabilizer Bar @ 0 Deg.	Bioshield	76%
Support-2(IA)	Stabilizer Bar @ 45 Deg.	Bioshield	76%
Support-3(IA)	Stabilizer Bar @ 90 Deg.	Bioshield	76%
Support-4(IA)	Stabilizer Bar @ 135 Deg.	Bioshield	76%
Support-5(IA)	Stabilizer Bar @ 180 Deg.	Bioshield	76%
Support-6(IA)	Stabilizer Bar @ 225 Deg.	Bioshield	76%
Support-7(IA)	Stabilizer Bar @ 270 Deg.	Bioshield	76%
Support-8(IA)	Stabilizer Bar @ 315 Deg.	Bioshield	76%