January 9, 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: CONTAINMENT LEAKAGE TESTING PROGRAM TECHNICAL SPECIFICATIONS FOR PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 (TAC NOS. 54823 AND 54824)

In a November 18, 1976 letter, as amended on April 19, 1984 and October 10, 1986, the licensee filed an application for license amendments to facility operating licenses DPR-44 and DPR-56. The application requested changes to the Peach Bottom technical specifications to reflect the current containment leakage testing program at the facility and to achieve conformance with the requirements of 10 CFR Part 50, Appendix J. On November 21, 1990, the Commission issued an exemption from certain requirements of Appendix J to 10 CFR Part 50 in response to your letters dated April 21 and June 23, 1988. Staff review of the technical specifications change request has identified the need for additional information and changes to reflect the November 1990 exemption, as outlined in the enclosure.

Please provide a response to the identified items within 120 days of receipt of this letter. This requirement affects fewer than ten respondents, and therefore, is not subject to Office of Management and Budget review under P.L. 96-511. Should you have any questions concerning the above, please do not hesitate to contact us.

Sincerely,

/S/

Gene Y. Suh, Project Manager
Project Directorate I-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosure:
Request for Additional
Information
cc w/enclosure:
See next page
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PDI-2 Reading	OGC
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	LDoerflein, RGN-I

PDI-2/LA	PDI-2/PM	PDI-2/D
MO'Brien	GSuh:tlc	WButler
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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See next page

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ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION
CONTAINMENT LEAKAGE TESTING PROGRAM TECHNICAL SPECIFICATIONS FOR
PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

1. Proposed TS 4.7.A.2.e. would allow the isolation of certain leakage paths during an integrated leakage rate test and does not require the performance of a Type A test following repair and/or adjustment of certain leakage paths. In addition, for each leakage path that remains isolated during the integrated leakage rate test, the proposed TS does not require the performance of local leakage rate measurements prior to effecting repairs in order to determine the as-found condition. The licensee also proposes to change the technical specifications bases on page 192 to reflect the proposed changes to TS 4.7.A.2.e. The staff notes that the approach outlined in proposed TS 4.7.A.2.e. reflects the approach described in proposed revisions to 10 CFR 50, Appendix J (51 FR 39538, October 29, 1986) with the exception of as-found condition determination. The proposed Appendix J revisions have not been issued as a final rule revision. Please discuss whether the proposed changes to TS 4.7.A.2.e. are consistent with section III.A.1.(a) of 10 CFR 50, Appendix J. It should be noted that concerns also exist for TS 4.7.A.2.e. as currently approved, which supports the need for an appropriate revision to this TS section. The staff also notes that the proposed TS is unclear in its use of the term "subsequent ILRT". Please clarify whether a "subsequent ILRT" refers to the continuation of a suspended integrated leakage rate test or to the performance of a new Type A test.

2. On proposed technical specifications (TS) page 184 for Table 3.7.2, please provide a discussion to support the addition of penetration numbers N-25, N-26, N-205A/B, N-212, and N-214.

3. On page 9 of the November 1986 submittal, it is stated that Note (12) does not apply to butterfly valves AO-2502B and AO-3502B. Please discuss why the note is no longer applicable and discuss how Type C testing is performed for these valves. If these valves are subjected to reverse direction testing, provide justification for your proposed test method.

4. Please discuss whether the footnote on proposed TS page 187a relating to anti-syphon devices should be modified to reflect recently completed modifications.

5. On proposed TS page 170, TS 4.7.A.4.c. and a portion of TS 4.7.A.4.b. were deleted with no applicable discussion. Please clarify or revise.

6. For the following penetrations and listed valves, please explain why these valves, which are listed in the current TS Table 3.7.4, no longer appear in the proposed Table 3.7.4. If the containment boundary was redefined in these cases, please provide a discussion to justify the designation of the proposed containment isolation valves. The discussion should also address whether the new containment boundary continues to meet applicable design criteria and regulatory requirements of the facility's licensing bases.

- N-9A: MO-23-20, MO-23-21, MO-2663
- N-9B: MO-13-20, MO-13-30, MO-2663
- N-13A: MO-10-154B, SV-4222
- N-13B: MO-10-154A, SV-4221
- N-16A: MO-14-11B, SV-4224
- N-16B: MO-14-11A, SV-4225
- N-39A: SV-4948B
- N-39B: SV-4948A
- N-211A: SV-4950B
- N-211B: SV-4950A

7. For the following penetrations and listed valves, please explain why these valves (which are listed in the facility's updated final safety analysis report in Table 7.3.1, titled "Primary Containment Isolation Valves") do not appear in the proposed TS Table 3.7.4.

- N-9A: feedwater startup bypass check valve
- N-42: check valve 11-17
- N-205A: globe valve
- N-236B: two check valves

8. For the following penetrations and listed valves, please explain why these valves appear in the current and proposed TS Table 3.7.4, but are not listed in UFSAR Table 7.3.1. Please discuss whether a UFSAR revision is appropriate.

- N-225: MO-13-39
- N-227: MO-23-57

9. For the footnote on proposed TS page 185, please specify the refueling outage referred to in the footnote. For each penetration affected by the footnote, please revise Table 3.7.4, as appropriate, to indicate which containment isolation valves will be subjected to Type C testing prior to the "next refueling outage."

10. Contrary to the discussion on page 8 of the October 1986 submittal, the facility's updated final safety analysis report indicates that valve MO-12-15 is a gate valve in Table 7.3.1. Please discuss whether a revision to the UFSAR is appropriate.

11. Proposed footnote (15) appears to exclude from Type C testing the following stop check valves: 13-9, 23-12, 23-13, and 13-10. These valves, however, are listed as primary containment isolation valves in both UFSAR Table 7.3.1 and in proposed TS Table 3.7.4. Please provide additional justification to support exclusion of these valves from local leak rate testing.

12. For valve MO-23-31 (Unit 2, penetration N-233) and valve MO-23-31 (Unit 3, penetration N-235), proposed TS Table 3.7.4 assigns footnote (17) which would exclude these valves from Type C testing given that the associated lines discharge below the minimum torus water level. This does not appear to be consistent with the information provided in an April 21, 1988 letter which

requested certain exemptions from Appendix J requirements. In the April 1988 letter, valves MO-23-31 for Units 2 and 3 were discussed as gate valves which would be tested in the reverse direction, and were not discussed among the valves whose associated lines terminated below the minimum torus water level. Please address this apparent discrepancy and explain whether footnote (10) for reverse direction testing of gate valves or footnote (17) is more appropriate.

13. Footnote (5) on proposed TS page 188 would delete the reference to testing during each operating cycle. Please provide a justification for this change.

14. The following proposed footnotes refer to Appendix J exemptions: (10), (13), (16), (17), (18), and (21). As discussed in the staff's safety evaluation related to Appendix J exemptions, issued November 21, 1990, Type C testing in the proposed manner do not constitute Appendix J exemptions. Please revise these footnotes if appropriate.

15. Footnote (10) applies to reverse direction testing of gate valves given that the stem force is greater than ten times the test differential pressure normal force. Do valves MO-23-31 for Units 2 and 3 need to be added to the list of valves in the proposed footnote? Do valves MO-10-31A/B belong in the list, given that the April 1988 submittal indicated that the stem force was only eight times greater than the differential pressure normal force? Does valve MO-10-32 belong in the list, given that the April 1988 submittal did not appear to include this valve in its discussion of applicable gate valves?

16. Footnote (11) applies to globe valves tested in the reverse direction. The following valves listed in proposed footnote (11) are shown as diaphragm control valves in UFSAR Table 7.3.1: AO-4240, AO-5240, AO-4247, AO-5247, AO-20-82, AO-20-94, AO-2509, AO-3509, AO-2-39, AO-2-316, AO-2513, and AO-3513. Please provide verification that the footnote is applicable to these valves.

17. Footnote (16) applies to gate valves tested in the reverse direction. The normal force ratio values given in the proposed footnote differ from the values stated in the April 1988 submittal. Please verify the accuracy of the values given in the proposed footnote, or revise as appropriate.

18. Footnote (17) states that Section XI testing will be performed in lieu of Appendix J testing. Please discuss whether this implies that Section XI testing can be substituted for Appendix J testing, or revise the footnote as appropriate. In addition, footnote (17) states that the applicable valves do not serve a safety function. Please discuss whether the applicable valves are considered to be non-safety related, or revise the footnote as appropriate.

19. The second half of the last paragraph on proposed TS Bases page 192 is related to an Appendix J exemption to exclude MSIV measured leakage from the local leak rate test limit of 0.60 La. Staff review of the requested exemption is continuing. In the interim, the proposed addition to the TS Bases should be deferred.

20. On proposed TS Bases page 192a, the licensee proposes to delete the following with respect to certain isolation valves that are tested by pressurizing the volume between the inboard and outboard isolation valves: "Additionally, the measured leak rate for such a test is conservatively assigned to both of the valves equally and not divided between the two." Please discuss whether this reflects a change in test methodology, and provide justification for the proposed deletion.

21. Please indicate the proposed effective date for the requested license amendments, taking into consideration procedural and administrative changes which may be needed to implement the associated TS changes.