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

Dear Mr. Bauer:

SUBJECT: NUREG-0737 ITEM II.K.3.28, VERIFY QUALIFICATION OF ACCUMULATORS ON AUTOMATIC DEPRESSURIZATION SYSTEM VALVES

Re: Peach Bottom Atomic Power Station, Units Nos. 2 and 3

We have reviewed your initial submittal regarding TMI Action Item II.K.3.28 in response to I&E Bulletin 80-01.

Based upon this review, we find that we need additional information to complete our review. The needed additional information is identified in the enclosure. We request that PECo provide this information by April 8, 1983.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P. L. 96-511.

Sincerely,

PORIGINAL SIGNED BY

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

Enclosure: Request for Additional Information

cc w/enclosure: See next page

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OFFICIAL RECORD COPY

USGPO: 1981-335-960

Philadelphia Electric Company

FEB 0 2 1983

cc w/enclosure(s):

Eugene J. Bradley Philadelphia Electric Company Assistant General Counsel 2301 Market Street Philadelphia, Pennsylvania 19101

Troy B. Conner, Jr. 1747 Pennsylvania Avenue, N.W. Washington, D. C. 20006

Thomas A. Deming, Esq. Assistant Attorney General Department of Natural Resources Annapolis, Maryland 21401

Philadelphia Electric Company ATTN: Mr. W. T. Ullrich Peach Bottom Atomic Power Station Delta, Pennsylvania 17314

Albert R. Steel, Chairman Board of Supervisors Peach Bottom Township R. D. #1 Delta, Pennsylvania 17314

Allen R. Blough U.S. Nuclear Regulatory Commission Office of Inspection and Enforcement Peach Bottom Atomic Power Station P. O. Box 399 Delta, Pennsylvania 17314

Mr. Ronald C. Haynes, Regional Administrator U. S. Nuclear Regulatory Commission, Region I Office of Inspection and Enforcement 631 Park Avenue King of Prussia, Pennsylvania 19406

Regional Radiation Representative EPA Region III Curtis Building (Sixth Floor) 6th and Walnut Streets Philadelphia, Pennsylvania 19106

M. J. Cooney, Superintendent Generation Division - Nuclear Philadelphia Electric Company 2301 Market Street Philadelphia, Pennsylvania 19101

Mr. R. A. Heiss, Coordinator
Pennsylvania State Clearinghouse
Governor's Office of State Planning and Development
P. O. Box 1323
Harrisburg, Pennsylvania 17120 PLANT(S): Peach Bottom 2 & 3 DOCKET #'s: 50-277/278

MULTI-PLANT ACTION F-55 QUALIFICATION OF ADS ACCUMULATOR SYSTEMS

REQUEST FOR ADDITIONAL INFORMATION

The licensee is requested to provide the following information:

- Define the number of times the ADS valves are capable of cycling using only the accumulator inventory at atmospheric pressure and at a specified percent (i.e., 70%) of drywell pressure, and the length of time these accumulators are capable of performing their function following an accident.
- Describe the ADS accumulator system design and operation (e.g., trains, air supply, capacity, alarms and their location, etc.).
- Define the basis for the allowable leakage criteria for the ADS accumulator system (e.g., boundary conditions, environmental, and seismic parameters, operator interface, margin, etc.).
- 4. What margin is in the allowable leakage criteria to account for possible increase in leakage resulting from the effects of a harsh environment and/or a seismic event.
- A statement that test and/or analysis performed verified that a harsh environment and/or seismic event would not increase the leakage rate.
- A statement that verifies that no credit was taken for non-safety related equipment and instrumentation when establishing the allowable leakage criteria.
- Define the periodic leak testing of the ADS accumulator system (i.e., the time interval between these leak tests, along with a concise description of the test procedure employed).
- Provide a concise description of the design and operation of the backup system and confirm that it will meet the overall requirements of the ADS system.
- 9. A concise description of the alarms and instrumentation associated with the ADS accumulator system and backup system, if applicable.
- A concise description of the tests performed on the backup system and their frequency.
- A concise description of the surveillance performed, and how frequent, on alarms associated with the ADS accumulator system and backup system, if applicable.

PLANT(S): Peach Bottom 2 & 3 DOCKET #'s: 50-277/278

MULTI-PLANT ACTION F-55 QUALIFICATION OF ADS ACCUMULATOR SYSTEMS

REQUEST FOR ADDITIONAL INFORMATION

(Cont'd)

- 12. A statement that test and/or analysis have verified that leakage will not prevent the ADS from performing as required.
- Excerpts from the plants technical specification, verifying that they specify the following.
 - ADS leak test frequency
 - Allowable leakage rate
 - Actions to be taken, in a specified time frame, should the allowable leakage rate be exceeded.
- A statement that confirms that the ADS accumulator system, associated equipment and control circuitry, and backup system, if applicable, are seismically qualified.
- 15. A statement that confirms that the ADS accumulator system and associated equipment and control circuitry are qualified to accommodate the affects of and are compatible with the environmental conditions associated with normal operation, maintenance, testing, and postulated accidents as stated in General Design Criteria 2 and 4 of Appendix A of 10 CFR 50.
- 16. A statement verifying that the ADS valves, accumulators, associated equipment and instrumentation are capable of performing their function during and following an accident situation while taking no credit for non-safety related equipment and instrumentation.