

March 13, 1995

Mr. George A. Hunger, Jr.
Director-Licensing, MC 62A-1
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, PA 19087-0195

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) RELATED TO RELIEF REQUEST
GVRR-2, REVISION 2, PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2
AND 3 (TAC NOS. M91586 AND M91587)

Dear Mr. Hunger:

By letter dated February 15, 1995, PECO Energy Company submitted Revision 2 to Relief Request GVRR-2 for the Peach Bottom Atomic Power Station, Units 2 and 3 Inservice Testing (IST) Program. The staff has conducted a preliminary review of that request and will require some additional information to complete that review. The staff's RAI is enclosed. You are requested to respond to the request in a time frame consistent with the review schedule requested in the February 15, 1995 submittal.

This requirement affects 9 or fewer respondents and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

If you have any questions on this RAI, please do not hesitate to contact me at (301) 415-1428.

Sincerely,
Original signed by
Joseph W. Shea, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-277/50-278

Enclosure: Request for Additional Information

cc w/encl: See next page

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Mr. George A. Hunger, Jr.
PECO Energy Company

Peach Bottom Atomic Power Station,
Units 2 and 3

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REQUEST FOR ADDITIONAL INFORMATION

PEACH BOTTOM ATOMIC POWER STATION , UNIT NOS. 2 AND 3

RELIEF REQUEST GVRR-2, REVISION 2

The previously approved version of GVRR-2, Revision 1, was granted to allow the licensee to test the excess flow check valves on a refueling outage frequency. The basis for granting relief from the code test frequency requirements was the following statement in the relief request:

"...Since these instruments are in use during plant operation and cold shutdown, removal of any of these instruments from service may cause a spurious signal which could result in a plant trip, an inadvertent initiation of a safety system, loss of decay heat and/or the defeating of safety interlocks..."

GVRR-2 has been resubmitted to request exercise testing of the excess flow check valves be allowed on a testing interval equivalent to a refueling outage length, but not necessarily occurring during the refueling outage. The relief request was presented in generic terms without regard for specific valves.

The code governing the Peach Bottom IST program requires that check valves be exercised to their position required to fulfill their safety function quarterly. The code allows this interval to be extended to cold shutdowns if impractical. Recent editions of the code allow the testing frequency to be extended to refueling outages if it is impractical to test valves during cold shutdowns. The licensee's submittal suggests that there may be other testing frequencies that are practical for some or all of the excess flow check valves besides refueling outages. In order for the relief request to be evaluated, the licensee should submit a list of all the valves it plans to put on a testing frequency that differs from the refueling outage frequency previously granted. In addition, for each valve, include a specific system justification for not testing that valve quarterly at power, during cold shutdowns, or during refueling outages.