Docket Nos. 50-277 and 50-278

Mr. George J. Beck
Manager-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: REQUEST FOR ADDITIONAL INFORMATION RE: EMERGENCY SERVICE WATER SYSTEM TECHNICAL SPECIFICATION CHANGE FOR PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 (TAC NOS. M82593 AND M82594)

By letter dated January 10, 1992, Philadelphia Electric Company (PECo) requested a revision to the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, Technical Specifications regarding the Emergency Service Water (ESW) system. After reviewing your submittal, the staff has concluded that some additional information is necessary to make a safety determination. The additional information required is described in the enclosure.

Response to the enclosed Request for Additional Information (RAI) is requested within 60 days from the 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 regarding this RAI, please contact me at (301) 504-2426.

Sincerely, Original signed by Richard J. Clark

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

Enclosure:

cc w/enclosure: See next page

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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20656

January 30, 1992

Docket Nos. 50-277 and 50-278

> Mr. George J. Beck Manager-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:

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Sincerely,

Joseph W. Sher, Acting Project Manager

Project Directorate I-2

Division of Reactor Projects - 1/II Office of Nuclear Reactor Regulation

Enclosure:

cc w/enclosure: See next page Mr. George J. Beck Philadelphia Electric Company Peach Bottom Atomic Power Station, Units 2 and 3

COL

J. W. Durham, Sr., Esquire Sr. V.P. & General Counsel Philadelphia Electric Company 2301 Market Street, S26-1 Philadelphia, Pennsylvania 19101

Philadelphia Electric Company ATTN: Mr. D. B. Miller, Vice President Peach Bottom Atomic Power Station Route 1, Box 208 Delta, Pennsylvania 17314

Philadelphia Electric Company ATTN: Regulatory Engineer, A1-25 Peach Bottom Atomic Power Station Route 1, Box 208 Delta, Pennsylvania 17314

Resident Inspector
U.S. Nuclear Regulatory Commission
Peach Bottom Atomic Power Station
P.O. Box 399
Delta, Pennsylvania 17314

Regional Administrator, Region I U.S. E. ear Regulatory Commission 675 Allendale Road King of Prussia, Tennsylvania 19406

Mr. Roland Fletcher Department of Environment 201 West Preston Street Baltimore, Maryland 21201

Carl D. Schaefer External Operations - Nuclear Delmarva Power & Light Company P.O. Box 231 Wilmington, DE 19899 Mr. Thomas M. Gerusky, Director Bureau of Radiation Protection Pennsylvania Department of Environmental Resources P. O. Box 2063 Harrisburg, Pennsylvania 17120

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

Public Service Commission of Maryland Engineering Division ATTN: Chief Engineer 231 E. Baltimore Street Baltimore, MD 21202-3486

Mr. Richard McLean
Power Plant and Environmental
Review Division
Department of Natural Resources
B-3, Tawes States Office Building
Annapolis, Maryland 21401

REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED REVISIONS TO THE PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3, TECHNICAL SPECIFICATIONS RELATING TO THE EMERGENCY SERVICE WATER SYSTEM DOCKET NOS. 50-277 AND 50-278

Philadelphia Electric Company (PECo or the licensee) requested NRC review of a revision to the Peach Bottom Atomic Power Station (PBAPS) Technical Specifications (TSs) concerning the allowable out of service times (AOT) for the Emergency Service Water (ESW) system. The staff has completed a preliminary review of the licensee's request. Based on that review, the staff has identified the following items for consideration. The licensee is requested to revise its submittal accordingly.

- 1. The staff does not consider the proposed 7 day AOT for inoperability of one ESW pump (change request 1) to be consistent with the standard TSs. The system conditions described in the standard TSs corresponding to the 7-day AOT for the plant service water pumps would allow the system to accommodate an additional single failure and still perform its design function. The PBAPS ESW system is not credited with the capability to perform its design function following an additional single failure with one ESW pump inoperable. The standard TSs prescribed a 72-hour AOT when the plant service water system has an operational capability similar to that described above for PBAPS. Accordingly, the licensee is requested to provide additional justification for a 7-day AOT or propose a 72-hour AOT for a single inoperable ESW pump.
- Insufficient detail for staff evaluation was provided with the Probabilistic Risk Assessment (PRA) of the 7-day AOT for inoperability of one ESW pump (change request 1). The licensee is requested to identify and explain assumptions incorporated in the PRA, and provide additional appropriate information.
- 3. Change request 5 decreases the test interval of the Emergency Cooling Tower (ECT) fans to once every three months. The proposed change to the associated section of the TS bases (change request 8) states: "the testing of the emergency cooling tower fans, the ESW Booster Pumps and the ECW pump, in accordance with existing ASME codes, assures the required availability of the equipment." The ECT fans are not currently part of the PBAPS In-Service Testing (IST) program described in Section XI of the ASME code. The licensee is requested to clarify the proposed testing requirements for the ECT fans.
- 4. In the safety discussion regarding the addition of a surveillance requirement to inspect and clean the ESW pump intake structures, the licensee states that operation of the pump which draws water from the intake structure being inspected may be blocked. The licensee also states that there is no concern that the proposed testing could decrease system availability. The licensee is requested to describe controls which will be used to assure system availability will not be reduced following completion of the proposed inspection.