50-277/228



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20565-0001

September 5, 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:

RELIEF REQUEST GVRR-2, REVISION 2, PEACH BOTTOM ATOMIC POWER

STATION, UNITS 2 AND 3, (TAC NOS. M92920 AND M92921)

Dear Mr. Hunger:

The NRC staff has reviewed relief request GVRR-2, Revision 2, as discussed in your letters dated July 14, 1995 and August 9, 1995, for the Peach Bottom Atomic Power Station, Units 2 and 3, Inservice Testing (IST) Program.

In GVRR-2, Revision 2, you proposed to test the excess flow check valves (EFCVs) during system outages at power operation and refueling outages on a refueling cycle interval.

For certain EFCVs listed in your July 14, 1995 letter, you stated that these valves could not be tested during power operation because either there are no system outages that would allow testing of these valves while the reactor is at power or the risk of an inadvertent reactor scram cannot be mitigated sufficiently during the system outage. Pursuant to 10 CFR 50.55a(f)(4)(iv), approval to use that portion of the 1989 edition of the ASME Code that provides for the use of OM-10 is granted. Further, the submission of this relief request meets the documentation requirements of paragraph 6.2(d) of OM-10.

However, when PECO's IST program is updated to the third ten-year interval, the portions of GVRR-2, Revision 2, related to the EFCVs that can only be tested during refueling outages should be included as a refueling outage justification. In addition, if during the second ten-year interval, you determine that additional valves from this category can be tested in systems out of service while the reactor is at power, you should submit an additional relief request to address this change.

For certain other valves listed in your August 9, 1995 letter, you proposed to test those valves during system outages when the reactor is at power. The staff has reviewed your submittals and concluded that the proposed alternative to the Code exercise procedure requirements is authorized for the EFCVs that can be tested at power in systems that are out of service pursuant to 10 CFR 50.55a(a)(3)(ii) based on the determination that compliance with the

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9509190013 950905 PDR ADOCK 05000277 specified requirements results in a hardship without a compensating increase in the level of quality and safety.

Further details of the staff's evaluation and conclusions are contained in the enclosed Safety Evaluation.

Sincerely,

original signed by John F. Stolz, Director Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket Nos. 50-277/278

Enclosure: Safety Evaluation

cc w/encl: See next page

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PDI-2 Reading

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* Previous concurrence

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DATE	9/5/95	6 h 2/95	8/17/95	8/29/95	9/2/95

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specified requirements results in a hardship without a compensating increase in the level of quality and safety.

Further details of the staff's evaluation and conclusions are contained in the enclosed Safety Evaluation.

Sincerely,

John F. Stolz, Director Project Directorate I-2

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

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cc w/encl: See next page

Mr. George A. Hunger, Jr. PECO Energy Company Peach Bottom Atomic Power Station, Units 2 and 3

cc:

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