



# PECO ENERGY

PECO Energy Company  
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September 19, 1995

Docket Nos. 50-277

50-278

License Nos. DPR-44

DPR-56

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Subject: Peach Bottom Atomic Power Station, Units 2 and 3  
Revision 2 to Relief Request No. GVRR-2  
to the Second Ten Year Interval of the Inservice  
Testing (IST) Program

- References:
1. Letter from G. A. Hunger, Jr. (PECO Energy Company) to U. S. Nuclear Regulatory Commission (USNRC), dated February 15, 1995
  2. Letter from J. W. Shea (USNRC) to G. A. Hunger, Jr. (PECO Energy Company), dated March 13, 1995
  3. Letter from G. A. Hunger, Jr. (PECO Energy Company) to USNRC, dated April 17, 1995
  4. Letter from J. F. Stolz (USNRC) to G. A. Hunger, Jr. (PECO Energy Company), dated July 7, 1995
  5. Letter from G. A. Hunger, Jr. (PECO Energy Company) to USNRC, dated July 14, 1995
  6. Letter from G. A. Hunger, Jr. (PECO Energy Company) to USNRC, dated August 9, 1995
  7. Letter from J. F. Stolz (USNRC) to G. A. Hunger, Jr. (PECO Energy Company), dated September 5, 1995

Dear Sir:

In References 1 through 6, PECO Energy Company and the USNRC corresponded regarding PECO Energy's requested relief from ASME Code requirements concerning Excess Flow Check Valves (EFCVs). These EFCVs are discussed in Relief Request No. GVRR-2 of the Inservice Testing Program (IST) for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. In Reference 7, the USNRC provided relief with certain provisions. In the proposed revised Relief Request No. GVRR-2, Revision 2, submitted in PECO Energy's Reference 5 letter, it was intended that the complete set of valves be listed as one category with the option to test the valves during a refueling outage or system outage when appropriate plant administrative controls are in place. However, the Safety Evaluation (SE) of Reference 7 has segregated these valves into two categories. These categories are: 1) valves that will be tested during refueling outages (Section 3.3.1, "Valves Tested During Refueling Outages") and 2) valves that are tested during system outages (Section 3.3.2, "Valves Tested During System Outages").

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Section 3.3.2 of the SE corresponds to PECO Energy's Reference 6 letter where we identified a list of valves that were scheduled to be tested during system outages when the reactor is at power. This list was not intended to be a permanent list in that additional valves were being reviewed to determine if the valves could be included in system outages. The purpose of providing the list was to justify the estimated 2-day extension to refueling outage 3R10 associated with performing all EFCV testing during the outage. Accordingly, only those EFCVs with a confirmed ability to be tested at power during system outages were included. Since that time, PECO Energy Company has identified 4 valves, currently listed in Section 3.3.1 of the SE, that can be tested during a system outage. These valves are XFC-2(3)-02-064A(B,C,D).

Testing these valves during the refueling outage results in undue hardship as identified in the justification provided in the Relief Request of Reference 5. To address the immediate concerns associated with the relief request, PECO Energy requests that the SE be revised to delete the identified four valves from Section 3.3.1 and add them to Section 3.3.2. We request that this revision be approved prior to the start of 3R10 on September 22, 1995. PECO Energy will continue to pursue USNRC approval of the relief request without the restriction of categorizing the valves.

If you have any questions, please contact us.

Very truly yours,

*G. A. Hunger, Jr.*

G. A. Hunger, Jr.  
Director - Licensing

cc: T. T. Martin, Administrator, Region I, USNRC  
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS