



50-277/278

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 25, 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:

By letter dated September 5, 1995, the NRC staff granted relief from ASME Code testing requirements for certain excess flow check valves at Peach Bottom Atomic Power Station, Units 2 and 3. The relief was granted in response to 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 the September 5, 1995 letter, the staff stated:

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

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

By letter dated September 19, 1995, you notified the staff that subsequent to the August 9, 1995 submittal, you had identified four additional valves that could be tested during system outages at power (Check valves XFC-2(3)-02-064A(B,C,D)). You requested that the relief which was granted to test certain valves during system outages other than refueling outages be extended to these valves.

The staff has reviewed your September 19, 1995 letter and concluded that, for these additional valves listed in your letter, 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 specified requirements results in a hardship without a compensating increase in the level of quality and safety.

Enclosed is a revised version of the Safety Evaluation provided with the staff's September 5, 1995 letter. The Safety Evaluation has been revised to change the category for the valves listed in your September 19, 1995 letter.

If you have any questions, please do not hesitate to contact the NRC Project Manager, Joe Shea, at (301) 415-1428.

Sincerely,

/s/

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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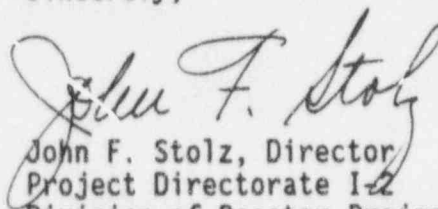
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The staff has reviewed your September 19, 1995 letter and concluded that, for these additional valves listed in your letter, the proposed alternative to the Code exercise procedure requirements is authorized for the EFCVs that can be tested at power in systems that are out of service pursuant to 10 CFR 50.55a(a)(3)(ii) based on the determination that compliance with the specified requirements results in a hardship without a compensating increase in the level of quality and safety.

Enclosed is a revised version of the Safety Evaluation provided with the staff's September 5, 1995 letter. The Safety Evaluation has been revised to change the category for the valves listed in your September 19, 1995 letter.

If you have any questions, please do not hesitate to contact the NRC Project Manager, Joe Shea, at (301) 415-1428.

Sincerely,



John F. Stolz, Director  
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Enclosure: Safety Evaluation

cc w/encl: See next page

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

Peach Bottom Atomic Power Station,  
Units 2 and 3

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