

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

(215) 841-5001

June 28, 1984

Docket No. 50-277

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Peach Bottom Atomic Power Station Units 2 and 3
NUREG-0737, Item II.K.3.18 and Regulatory
Guide 1.97

- REFERENCE:
- (1) Letter from S. L. Daltroff, PECO, to
D. G. Eisenhut, dated April 15, 1983
Subject: PBAPS Response to NUREG-0737,
Supplement 1
 - (2) Letter from S. L. Daltroff, PECO, to
D. G. Eisenhut, dated January 16, 1984
Subject: PBAPS Implementation of
NUREG-0737, Supplement 1, Regulatory
Guide 1.97
 - (3) Letter from S. L. Daltroff, PECO, to
J. F. Stolz, NUREG-0737, Item
II.K.3.18, ADS Actuation, dated
July 15, 1983

Dear Mr. Eisenhut:

This letter requests an extension in the commitment dates for the submittal of two responses regarding compliance with Regulatory Guide 1.97 and NUREG-0737, II.K.3.18.

The reference (1) letter established NRC commitment dates for the submittal of two reports detailing Peach Bottom's compliance with the design and qualification criteria specified by Regulatory Guide 1.97. The first report was submitted January 16, 1984, as two attachments to the reference (2) letter. This report detailed Peach Bottom's compliance with all Regulatory Guide 1.97 variables except "Primary Containment Isolation Valve Position Indication." The report concerning primary containment isolation valve position indication was committed to the NRC by

8407060138 840628
PDR ADOCK 05000277
P PDR

A003
1/0

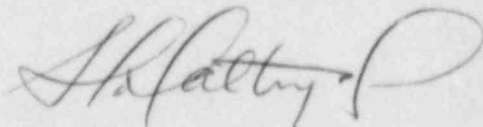
July 1, 1984, in the reference (1) and (2) letters. The Commission, by Order dated June 14, 1984, confirmed this commitment date.

The review of the primary containment isolation valve position indication portion of Regulatory Guide 1.97 involves an extensive investigation of the design (including power sources, cable routing, equipment qualification, quality assurance, control room display) of the approximately 160 isolation valves on each unit. At the time the NRC commitment was made, the date appeared to be realistic. We have been supporting this effort on an overtime basis. Our best estimate as to the date for submittal of the report to the NRC is now September 28, 1984. Accordingly, we request an extension in the schedule to September 28, 1984 for submitting the report addressing our plans for compliance with the primary containment isolation valve position indication requirements of Regulatory Guide 1.97.

The reference (3) letter contains Philadelphia Electric Company's commitment to modify the logic of the automatic depressurization system (ADS) on Peach Bottom APS Units 2 and 3 in response to Item II.K.3.18 of NUREG-0737, "Clarification of TMI Action Plan Requirements." Additionally, the letter committed to the submittal of a Technical Specification amendment application addressing this modification by June 30, 1984. The modification involves the bypass of the high drywell pressure signal after a specific time interval following the receipt of a low reactor water level signal and the addition of a manual inhibit switch. The time delay is determined by a plant-specific analysis. This analysis was recently completed by our consultant and is undergoing in-house review. This review, and the preparation and review of the required Technical Specification amendment application, will necessitate an extension in the schedule for submitting the application until September 14, 1984.

Should you have any questions regarding this matter, please do not hesitate to contact us.

Very truly yours,



WCB:vdw

cc: A. R. Blough, Site Inspector