

# PHILADELPHIA ELECTRIC COMPANY

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VICE PRESIDENT  
ELECTRIC PRODUCTION

(215) 841-5001

November 1, 1984

Docket Nos. 50-277  
50-278

Mr. John F. Stolz, Chief  
Operating Reactors Branch #4  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Peach Bottom Atomic Power Station  
NUREG-0737, Item II.E.4.2(7)  
Radiation Signal On Purge Valves

REFERENCE: a) Correspondence dated December 12, 1983,  
J. F. Stolz, NRC, to E. G. Bauer, Jr., PECO  
b) Correspondence dated January 25, 1984,  
S. L. Daltroff, PECO, to J. F. Stolz, NRC  
c) Correspondence dated September 28, 1984  
J. F. Stolz, NRC, to E. G. Bauer, Jr., PECO

Dear Mr. Stolz:

This letter identifies our plans for responding to reference (c) titled, "Updated Safety Evaluation for NUREG-0737, Item II.E.4.2(7)", and reviews the past licensing activities associated with this issue. Reference (c) provided clarification relative to which containment purge and vent line sizes need high radiation isolation trips, and concluded that the Peach Bottom design was not in conformance with the design criteria presented in the Updated Safety Evaluation.

NUREG-0737, Item II.E.4.2, requires that "Containment purge and vent isolation valves must close on a high radiation signal". However, NUREG-0737 did not specify any design criteria for the trip feature. In reference (a), the staff provided guidance regarding the design criteria for Item II.E.4.2. The guidance required a high radiation trip initiated by gaseous effluent radiation monitors. In reference (b), we proposed high radiation trips for valves greater than 3 inches in diameter.

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This proposed Peach Bottom design is in full accordance with the NRC evaluations of this topic provided to the BWR Owners' Group via letters dated October 14, 1981, and May 31, 1983. Our proposed design is also consistent with the design at our Limerick Generating Station which was specifically reviewed and approved by the NRC staff in the Safety Evaluation Report (reference: NUREG-0991, Section 6.2.4.3). Consequently, we were surprised to find that the Containment Systems Branch in reference (c) requested the high radiation isolation trip feature for all valves regardless of size.

Since the proposed Peach Bottom design is in compliance with previous NRC evaluations, is consistent with designs recently approved for another plant, and since the updated evaluation substantially alters your generic position on this issue, we have referred this subject to the BWR Owners' Group for resolution. The BWR Owners' Group will consider further generic efforts for resolution of this issue at its November 7, 1984, general meeting. If this topic is not pursued generically by the BWROG, we will re-evaluate our position and advise you of our intended course of action by November 30, 1984.

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

Very truly yours,



cc: A. R. Blough, Site Inspector