

PHILADELPHIA ELECTRIC COMPANY

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PHILADELPHIA, PA. 19101

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

(215) 841-5001

August 31, 1984

Docket Nos. 50-277
50-278

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

- REFERENCES:
1. Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events", July 8, 1983.
 2. Letter, J. F. Stolz, USNRC to E. G. Bauer, Jr., PECO, "Clarification of Required Actions Based on Generic Implications of Salem ATWS Events", October 21, 1983.
 3. Letter, S. L. Daltroff, PECO, to D. G. Eisenhut, USNRC, Response to Generic Letter 83-28, November 4, 1983
 4. Letter, S. L. Daltroff, PECO, to D. G. Eisenhut, USNRC, Follow up Response to Generic Letter 83-28, June 29, 1984

Dear Mr. Eisenhut:

This letter is a follow-up to the Reference 4 letter and addresses the current status of Philadelphia Electric Company's ongoing program to address Items 3.1.2 and 3.2.2 in Generic Letter 83-28 "Required Actions Based on Generic Implications of Salem ATWS Events," July 8, 1983. The required action regarding post maintenance testing of reactor protection system components and all other safety related equipment, respectively is as restated below along with our response.

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NRC Position

3.1.2 & 3.2.2

Licensees and applicants shall submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications, where required.

Response

The Reference 4 letter described Philadelphia Electric Company's methods and tentative schedules for updating existing Maintenance Procedures and ensuring that the updated procedures contain the latest vendor information.

By way of this letter, we are transmitting our progress to-date in performing this task. Attachment 1 to this letter specifies those procedure which have been updated and approved by the Plant Operations Review Committee. Attachment 2 to this letter represents the current schedule for completion of this task, although it is subject to modification as required by changing plant maintenance requirements and the need to expedite the review and approval process for certain procedures.

Philadelphia Electric Company is continuing its participation in the BWR Owners' Group subcommittee to address the updating of Reactor Protection System (RPS) maintenance manuals. The subcommittee will be evaluating and approving the program and methodologies of the NSSS vendor to be used for RPS manual updating. It is expected that the program and schedules will be finalized by December 1, 1984. We believe this approach will enhance the recommendations contained in the INPO NUTAC Report, February 1984, concerning Section 2.2.2 of Generic Letter 83-28 by establishing appropriate NSSS vendor contact for components supplied by or through the NSSS vendor.

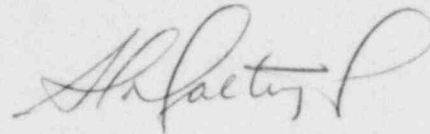
In order to keep the NRC informed of our progress in these tasks, Philadelphia Electric Company will submit the status of the current Maintenance Procedure update program along with the plans and progress for updating RPS manuals by February 1, 1985.

Mr. Darrell G. Eisenhut

August 31, 1984
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Should you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "A. R. Blough". The signature is written in dark ink and is positioned below the typed closing "Very truly yours,".

Attachments

cc: A. R. Blough, Site Inspector

COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF PHILADELPHIA :

S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company; that he has read the foregoing partial response to Generic Letter 83-28 and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

S. L. Daltroff

Subscribed and sworn to
before me this 31ST day
of August 1984

Patricia D. Scholl

Notary Public

PATRICIA D. SCHOLL
Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires February 10, 1986

Updated Procedures Approved by the Plant Operations Review Committee

<u>PROCEDURE</u>	<u>REV.</u>	<u>TITLE</u>	<u>DATE APPROVED</u>
M-1.3	10	Main Steam Isolation Valve Maintenance	8/25/83
M-1.6	9	Relief Valve Replacement	1/16/84
M-2.1	10	Reactor Recirculation Pump Seal Overhaul	1/16/84
M-3.1	16	Control Rod Drive Replacement	5/24/84
M-4.2	13	Opening the Reactor Vessel	12/15/83
M-4.36	8	Steam Line Plug Installation	12/15/83
M-4.51	6	Removal of Drywell Head	12/15/83
M-4.52	7	Removal of Reactor Vessel Head	10/24/83
M-9.1	10	Limiterorque Switches Inspection, Maintenance, Adjustment, Lubrication	5/22/84
M-14.1	4	Core Spray Pump Maintenance	3/26/84
M-23.5	2	HPCI Check Valves Maintenance (Valves 32, 61, 65)	7/2/84
M-52.2	17	Diesel Engine Maintenance	8/1/84
M-52.14	1	Diesel Turbocharger Inspection	7/6/84
M-4.12	1	SRM/IRM Detector Drive Maintenance	8/15/84

Updated Procedures Approved by the Plant Operations Review Committee

M-1.4	Deleted
M-1.9	Deleted
M-1.11	Deleted
M-1.14	Deleted
M-1.15	Deleted
M-1.16	Deleted
M-1.17	Deleted
M-1.21	Deleted
M-1.22	Deleted
M-1.26	Deleted
M-2.10	Deleted
M-2.11	Deleted
M-3.12	Deleted
M-4.11	Deleted
M-4.13	Deleted
M-4.14	Deleted
M-12.22	Deleted
M-23.21	Deleted
M-23.6	Deleted
M-23.8	Deleted
M-32.6	Deleted

Tentative Procedure Review Schedule

PRIORITY GROUP 2

COMPLETE AND SUBMITTED BY: 10/1/84

M-1.2	EHC System Flush
M-1.11	Deleted
M-3.2	Hydraulic Control Unit Repair
M-3.3	Control Rod Drive System Pump Repair
M-1.25	MSIV Air Cylinder and Dashpot Maintenance
M-10	Tip Drive Unit Maintenance
M-8.3	Off-Gas Filter Maintenance
M-8.5	Recombiner Compressor Maintenance
M-8.7	Recombiner Heat Exchanger Maintenance
M-9.2	ASCO Valve Repair
M-10.16	Residual Heat Removal (RHR) Pump Mechanical Seal Maintenance
M-11.1	Standby Liquid Control Pump Maintenance
M-11.3	Standby Liquid Control Accumulator Maintenance
M-12.1	Reactor Water Clean-Up (RWCU) Pump Maintenance

Tentative Procedure Review Schedule

PRIORITY GROUP 2 (cont'd)

- M-12.2 Reactor Water Clean-Up (RWCU) Heat Exchanger Maintenance
- M-13.3 Reactor Core Isolation Cooling (RCIC) Pump Maintenance
- M-19.1 Fuel Pool Filter Demineralizer Maintenance
- M-23.1 High Pressure Coolant Injection (HPCI) Pump Drive Turbine Maintenance
- M-33.1 Emergency Service Water (ESW) Pump Maintenance

COMPLETE AND SUBMITTED BY: 11/1/84

- M-40.2 Ventilation Butterfly Valve Maintenance
- M-48.1 Emergency Service Water Booster Pump Maintenance
- M-48-2 Emergency Cooling Water Pump Maintenance (EMERGENCY COOLING TOWER)
- M-52.5 Diesel Engine Supercharger Repair
- M-52.6 Diesel Engine Bearing and Supercharger Inspection
- M-53.1 13.2KV Emergency Auxiliary Switchgear Maintenance
- M-57.1 125V DC Equipment Maintenance

Tentative Procedure Review Schedule

PRIORITY GROUP 3

COMPLETE AND SUBMITTED BY: 12/3/84

- M-3.9 Replacement of CRD Ball Check
- M-4.25 Instrument Handling Tool Air Cylinder Replacement
- M-4.26 Fuel Support Casting Grapple Repair
- M-4.28 CRD Thermal Sleeve Removal
- M-4.29 CRD Thermal Sleeve Installation
- M-4.34 Reactor Vessel Stabilizers Inspection and Repairs
- M-4.35 Installation and Removal of Jet Pump Seal Plugs
- M-4.38 Vibration Instrumentation Sensor and Hardware Removal
- M-4.41 Reactor Vessel Stabilizers - Inspection and Minor Adjustments
- M-4.42 Electrical Heating of Reactor Vessel Head
- M-4.43 Coating Repairs to the Refueling Floor
- M-4.68 Tip Indexer Maintenance
- M-4.70 Unit 3 Emergency Hoist Operation
- M-4.72 Removal of Surveillance Specimen

Tentative Procedure Review Schedule

PRIORITY GROUP 3 (cont'd)

- M-5.1 Visual Inspection Valves
- M-6.2 Feedwater Long Path Recirc Valve Maintenance
- COMPLETE AND SUBMITTED BY: 12/31/84
- M-6.3 28A Drain Valves Replacement
- M-6.4 Feedwater Sample Probe Removal
- M-6.5 Feedwater Sample Probe Inspection
- M-7.1 Visual Inspection of Vacuum Breakers
- M-7.2 Torus Coating - Touch-Up
- M-8.4 Recombiner Cartridge Replacement
- M-8.6 Installing a 2 inch MK 131 Valve in the Unit 2
Mechanical Compressor Discharge Tie Line to the Unit 3
Hold-Up Pipe
- M-10.3 RHR Valve MO-154 Repair
- M-10.4 MO-89 Valve Inspection
- M-10.7 3-10-89B Valve Repair
- M-10.10 RV35B Repair
- M-10.12 MO-154 Disc and Skirt Repair

Tentative Procedure Review Schedule

PRIORITY GROUP 3 (cont'd)

- M-10.13 RHR Heat Exchanger Drain Temporary Repair
- M-10.14 RHR Heat Exchanger Double Nut Installations
- M-10.17 MO-10-89 B&C Valve Seat Repair (Machining)
- M-10.18 RHR Pump Suction Header Drain Line Repair
- M-10.19 RHR Pump Discharge Sensing Line Repair
- M-11.2 Standby Liquid Control Explosive Valve Replacement

COMPLETE AND SUBMITTED BY: 2/1/85

- M-13.1 Reactor Core Isolation Cooling (RCIC) Turbine Maintenance
- M-13.2 RCIC Valve MO-2-13-16 Limitorgue Replacement
- M-13.4 MO-13-15 or 16 Valve Maintenance
- M-13.5 RCIC Turbine Exhaust Check Valve Maintenance
- M-14.2 MO-14-11A and 11B or MO-14-12A and 12B Valve Maintenance
- M-14.3 Core Spray Line Repair - A & B Loops
- M-14.4 Core Spray Line Non-Destructive Test Weld Preparation and Verification - A & B Loops

Tentative Procedure Review Schedule

PRIORITY GROUP 3 (cont'd)

- M-14.5 Core Spray Line Weld 14-A-20 Recontour of Weld Crown Preparation

- M-14.6 Core Spray Line Repair - A or B Loops

- M-14.7 Core Spray Test Return Line to Torus - R.O. Removal Blank Installation and Blank Removal R.O. Installation

- M-14.8 Core Spray Test Return Line Isolation Valve MO-14-26A Repairs

- M-17.3 Reactor Building Crane Runway Realignment

Tentative Procedure Review Schedule

PRIORITY GROUP 3

COMPLETED AND SUBMITTED BY: 3/1/85

M-19.2 Fuel Pool Work Table Support Bracket Straightening

M-23.3 MO-2-23-20 Valve Repair

M-23.4 HPCI Lube Oil Flush

M-23.7 HPCI Hydraulic Drain Line Reinstallation

M-32.4 HPSW Demin. Flush Tap

M-12.3 RWCU Pump Vent Piping Replacement

M-12.4 Reactor Water Clean-Up System - Installation of Substitute 62 Check Valve

M-12.5 Reactor Water Clean-Up Pump - Installation of 1-1/2" Flanges on Pump Discharge Line

M-12.6 Reactor Water Clean-Up System Recirc Flow to Reactor - MO-12-68 Valve Maintenance

M-12.7 Reactor Water Clean-Up System Recirc Flow to Reactor 12-62 Check Valve Maintenance

M-12.8 Reactor Water Clean-Up System Regenerative Heat Exchangers Installation of Flanged Connecting

M-12.9 Reactor Water Clean-Up System Regenerative Heat Exchanger's Solvent Cleaning Equipment Placement

Tentative Procedure Review Schedule

PRIORITY GROUP 3 (cont'd)

- M-12.10 Reactor Water Clean-Up System Regenerative Heat Exchanger's Installation of Piping for Solvent Cleaning
- M-12.11 Reactor Water Clean-Up System Regenerative Heat Exchangers - Fabrication of 4" Spool Piece for Channel Outlet
- M-12.12 Reactor Water Clean-Up System Regenerative Heat Exchangers - Cleaning with NS-1
- COMPLETE AND SUBMITTED BY: 4/1/85
- M-12.13 Regenerative Heat Exchangers Seal Ring Installation
- M-12.14 R.W.C.U. System Regenerative Heat Exchangers - Installation of Flanged Connections
- M-12.15 R.W.C.U. System Regenerative Heat Exchangers - Installation of Equipment and Piping for Solvent Cleaning
- M-12.16 R.W.C.U. System Heat Exchangers - Repairs to Channel-Diaphragm Seal Weld
- M-12.17 R.W.C.U. Test Tap Installation
- M-12.18 R.W.C.U. Gate Valves Maintenance (15 and 18)
- M-12.19 Reactor Water Clean-Up System Regenerative Heat Exchangers Cleaning with NS-1
- M-12.20 Regenerative Heat Exchangers Seal Ring Installation

Tentative Procedure Review Schedule

PRIORITY GROUP 3 (cont'd)

M-12.21	R.W.C.U. System Chemical Cleaning Connection Removal
M-12.23	Installation of 62 Check Valve in R.W.C.U. System
M-52.4	Diesel Generator Phase Current Transformer Replacement
M-52.7	Diesel Blower Filter Change & Gear Inspection
M-52.8	Diesel Govenor Change
M-52.9	Diesel Generator Turbosupercharger Inlet Filter Silencer Assembly Repair
M-57.2	24V DC Equipment Maintenance
M-57.4	Battery Charger Maintenance
M-57.6	24/130 VDC Charger Installation
M-57.7	24/130 VDC Spare Charger Installation
M-65.9	Hydraulic Snubber Lug Grinding
M-94.1	Torus Area - Installation of Demineralized Water Supply Valve and Tap

Tentative Procedure Review Schedule

PRIORITY GROUP 4

COMPLETE AND SUBMITTED BY: 5/1/85

M-1.28 MSIV Pneumatic Control Manifold Rework

M-2.12 Repair of No. 2 'A' Recirculation Pump Low Pressure
Cavity Pressure Sensing Line

M-2.13 65A Recirculation Pump Equilizer Valve Underseat Drain
Line Repair

M-4.18 Service Platform Mechanical Inspection

M-4.71 Reactor Drain Line Freeze Plug

M-10.5 MO-89 Valve Seat Repair (Welding)

M-10.20 MO-2-10-25A, MO-2-10-25B, MO-3-10-25A, and MO-3-10-25B
Valves Repair

M-10.21 HPSW Piping Test Tap Replacement

M-10.22 RHR Pump Suction Header Repair

M-10.23 RHR Pump Suction Header Repair

M-10.25 Valve Disc Seating Surface Repair

M-10.26 RHR Head Spray Pipe Repair

Tentative Procedure Review Schedule

PRIORITY GROUP 4 (cont'd)

M-10.27	RHR Head Spray Pipe Partial Replacement
M-12.24	Removal of Spool Piece from 6" RWCU Line from Recirculation Pump Suction
M-12.25	RWCU MO-18 Valve and Ape Assembly Replacement
M-17.4	Reactor Building Crane Main Drum Pinion Gear Replacement
M-17.5	Reactor Building Crane Auxiliary Hook Load Test
M-19.3	Fuel Grapple Tube Repairs
M-32.5	HPSW Piping Test Tap Plug
M-33.2	Core Spray Pump Motor Oil Cooler Supply Line Cleaning and Replacement
M-52.10	Diesel Engine Main Bearing Changeout
M-57.3	125 Volt and 24 Volt Battery Corrective Maintenance

Tentative Procedure Review Schedule

PRIORITY GROUP 5

COMPLETED & SUBMITTED BY: 6/1/85

- M-1.8 MSIV Air Cylinder Repair
- M-2.14 1" Loop Selection Interlock Line (270 Degrees Az Riser) Removal
- M-2.15 1" Loop Selection Interlock Line Cap Installation at Drywell Penetration N-52
- M-2.16 Recirc Pump Discharge Piping Hanger (H-9) Repair and Modification
- M-3.11 CRD Scram Discharge Header Decontamination
- M-4.1A Refueling Outage Preparation
- M-4.20 Refueling Platform Electrical Inspection
- M-4.53 Reactor Head Detensioning
- M-4.59 Inspection of Equipment and Work Required Prior to Reactor Vessel Reassembly
- M-4.73 Shroud Head Bolt Replacement
- M-7.6 Outboard MSIV Room Penetration Boot Seal Replacement
- M-7.10 Replacement of Torus/Drywell Vacuum Breaker Hinge Arms, Hinge Pins, Hinge Pin Bushings, Pallet Seal and 24 inch "O" Ring
- M-10.9 RHR Gate Valves Maintenance (13, 15, 20, 26, 31, 39)
- M-10.28 Shutdown Cooling Pipe Support Repair

Tentative Procedure Review Schedule

PRIORITY GROUP 5 (cont'd)

M-10.29 RHR Full Flow Globe Valve - MO-10-34A

M-10.30 3C RHR Motor Repair and Rewind

COMPLETE AND SUBMITTED BY: 7/1/85

M-17.6 Reactor Building Crane Main Block Bronzoid Bushing Rework

M-17.7 Diesel Building Crane Maintenance

M-17.8 Reactor Building Crane Main Hoist Motor Pinion Replacement

M-23.2 High Pressure Coolant Injection (HPCI) Pump Maintenance and Gear Box Assembly Maintenance (5 Yr. Inspection)

M-23.10 HPCI Woodward Remote Servo Repair

M-23.13 HPCI - Pump Drive Turbine Casing, Disassembly and Reassembly

M-23.14 HPCI - Pump Drive Turbine Carbon Ring Inspection and/or Replacement

M-23.15 HPCI Overspeed Trip Device

M-23.16 High Pressure Coolant Injection (HPCI) Pump Drive Turbine Journal and Thrust Bearing Disassembly, Inspection and Reassembly

M-23.17 HPCI Turbine 5 Year Inspection

Tentative Procedure Review Schedule

PRIORITY GROUP 5 (cont'd)

- M-23.19 High Pressure Coolant Injection (HPCI) Pump Drive Turbine IMP Pump Changeout
- M-23.20 High Pressure Coolant Injection (HPCI) Exhaust Drain Line Repair

COMPLETE AND SUBMITTED BY: 8/1/85

- M-32.7 HPSW Pumps Motor Oil Cooler Water Supply Relocation
- M-52.11 Diesel Engine Cylinder Liner Replacement
- M-52.12 Vertical Drive Inspection and Repair
- M-52.13 Diesel Generator Oil Storage Tanks Clean Out
- M-65.1 Hydraulic Snubber Overhaul
- M-65.10 Mechanical Snubber Surveillance
- M-65.11 Hydraulic Snubbers Extension Piece Length Modification
- M-GE-2 CRD Thermal Sleeve Removal and Installation
- M-GE-3 Installation and Removal of Jet Pump Seal Plugs

COMPLETE AND SUBMITTED BY: 5/31/86

Review of Remaining 125 Procedures