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NUCLEAR ENGINEERING & SERVICES DEPARTMENT

May 14, 1992

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
Inservice Testing Program

REFERENCE: (1) Letter from J. W. Gallagher (PECo) to W. R. Butler (NRC), dated June 29, 1988

(2) Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs", dated April 3, 1989

(3) "Minutes on the Public Meetings on Generic Letter 89-04", dated October 25,1989

(4) Letter from W. R. Butler (NRC) to G. J. Beck (PECo), dated January 17, 1991

(5) Letter from W. R. Butler (PECo) to NRC, dated October 8, 1991

(6) Letter from A. R. Blough (NRC) to D. M. Smith (PECo), "Combined Inspection 50-277/92-07 and 50-278/92-07", dated April 16, 1992

Dear Sir:

In Reference (1), Philadelphia Electric Company (PECo) submitted a revised second 10-year interval Inservice Testing (IST) Program for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. In Reference (4), the NRC transmitted a Safety Evaluation of the IST Program. In Reference (5), PECo provided an updated, uncontrolled copy of Revision 2 to the IST Program which included changes recommended by the NRC in the Safety Evaluation.

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The purpose of this letter is to submit for your information only, a copy of new Relief Request GVRR-6, Revision 0 (Attached).

New Relief Request GVRR-6 lists in a single location all the PBAPS Units 2 and 3 check valves that are included in the check valve sample disassembly and inspection program which has been implemented in accordance with the guidance provide in Generic Letter 89-04 (Reference 2), Attachment 1, Position 2 ("Alternative to Full Flow Testing of Check Valves"). Currently, the valves included in GVRR-6 are also listed in NRC approved Relief Requests 10-VRR-1, 13-VRR-1, 14-VRR-1, 14-VRR-3, and 23-VRR-1.

As a result of this new Relief Request, Relief Request 10-VRR-1, 13-VRR-1, 14-VRR-1, 14-VRR-3, and 23-VRR-1 will be deleted from the IST Program.

We note that this new Relief Request is being submitted for your information only and not for review and approval. As stated in Reference 3, "(i)n cases where a generic letter position that approves an alternative to the ASME Code is being followed, a relief request is not required, but the deviation from the Code should be documented in the IST program along with its method of approval (i.e., through the relevant generic letter position)." This Relief Request satisfies this position.

During a recent NRC Inspection (Reference 6), PECo committed to the Inspector to submit this new Relief Request by May 19, 1992. This letter satisfies this commitment.

If you have any questions, please contact us.

Very truly yours,

G. J. Beck, Manager
Licensing Section

Attachment

cc: T. T. Martin, Administrator, Region I, USNRC
J. J. Lyash, USNRC Senior Resident Inspector, PBAPS

Attachment

RELIEF REQUEST NO. GVRR-6, REVISION 0

Valve(s):

CHK-2-10-019A,B,C,D	CHK-3-10-019A,B,C,D
CHK-2-10-21541	CHK-3-10-31541
CHK-2-10-21577A,B	CHK-3-10-31577A,B,
CHK-2-13-029	CHK-3-13-029
CHK-2-14-023A,B,C,D	CHK-3-14-023A,B,C,D
CHK-2-14-066A,B,C,D	CHK-3-14-066A,B,C,D
CHK-2-14-29036A,B	CHK-3-14-39036A,B
CHK-2-14-29051A,B	CHK-3-14-39051A,B
CHK-2-23-062	CHK-3-23-062

ategory: C

Testing Requirement(s): Exercise in the reverse direction.

Basis for Relief: The above valves all perform a safety function in the reverse direction. Because of system configuration, these valves cannot be verified closed using visual verification, system parameters or by leak testing methods. Valve disassembly will be required to verify reverse direction closure. Disassembly of the valves, if attempted at cold shutdown, could result in a delayed plant start-up.

Alternate Testing: Reverse flow closure will be verified at refueling by check valve disassembly and inspection; partial stroke will be performed after valve reassembly.

A check valve sample disassembly and inspection program is implemented in accordance with the NRC guidance provided in Generic Letter 89-04, Attachment 1, Position 2 and is documented in Section 5.4.2 of the IST Program text. This sample program groups valves that are of the same design, have the same service condition, and have the same valve orientation.

At least one valve from each group shall be tested during each refueling outage, and each valve will be tested at least once every six years. If the disassembled valve is unable to be full-stroke exercised, or is binding, or failure of the valve internals is observed, the valve shall be refurbished as necessary and the remaining valves in the group shall be disassembled, inspected, and manually full-stroke exercised.