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SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

November 15, 1984

Docket Nos. 50-277  
50-278

Inspection Report Nos. 50-277/84-24  
50-278/84-20

Mr. Richard W. Starostecki, Director  
Division of Project and Resident Programs  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Starostecki:

Your letter of October 17, 1984, forwarded combined Inspection Report 50-277/84-24 and 50-278/84-20. Appendix A of your letter addresses one activity which does not appear to be in full compliance with Nuclear Regulatory Commission requirements. This item is restated below along with our response.

- A. 10 CFR 50.59 allows licensees to make changes in the facility as described in the safety analysis report (SAR) without prior Commission approval, unless the proposed change involves a revision to the Technical Specifications or an unreviewed safety question. Further, licensees shall maintain records of changes in the facility as described in the SAR, including for each change a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

FSAR Section 4.8.6 states that during the Low Pressure Coolant Injection mode of operation of the Residual Heat Removal (RHR) System, a bypass line to the suppression pool is provided so that the pumps are not damaged by operating with the discharge valves shut.

Contrary to the above, on April 27, 1982, and on June 22-25, 1984, the minimum flow bypass line for an RHR pump was deactivated in the closed position with the reactor operating. The LPCI mode of RHR was considered operable, yet no written safety evaluation was maintained to provide the basis that the change did not involve an unreviewed safety question.

This is a Severity Level IV violation (Supplement I) applicable to DPP-56.

### Response

Plant staff discussed the inoperability of the minimum flow valves on the occasions identified in the inspection report. In considering pump operability, the plant staff considered that the pump would be able to perform its intended function during a design basis LOCA. A written safety evaluation to document this decision was not provided. Operability of this pump during a LOCA which maintained reactor pressure above pump shutoff head for a considerable length of time was considered a very low probability. However, in retrospect, such a LOCA could result in damage to the pump thereby making it inoperable. In any case, judgement by the plant staff resulted in considering the pump as operable and maintaining it in operable status in all aspects with the exception that the minimum flow valve was closed and inoperable.

As indicated in the Inspection Report and above, a written safety evaluation which satisfies 10 CFR 50.59 requirements was not developed. Operations personnel have been instructed not to deactivate any minimum flow valves, and in a letter dated September 11, 1984, Operations personnel were instructed to discuss any abnormal ECCS configurations with a Senior Engineer to determine if the configuration requires a safety evaluation. The senior staff has been instructed to be more attentive to areas which could involve possible 10 CFR 50.59 consideration. In addition, Philadelphia Electric Company, in response to the NRC Order dated June 18, 1984, created an appraisal team which is currently evaluating our process for performing safety evaluations and reviews of procedures at the Peach Bottom Atomic Power Station. This evaluation began on September 4, 1984, following NRC approval of the plan. The resolution of the appraisal team findings and recommendations will be reported to the NRC three months after completion of the appraisal team's report.

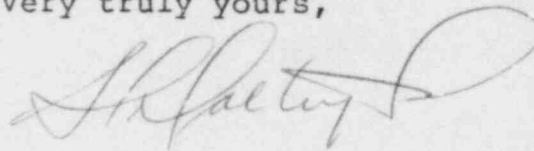
To justify maintaining an RHR pump which has an inoperable minimum flow valve in an operable state, an RHR pump was

capacity tested with the minimum flow valve fully open. The test proved that the pump can adequately supply the required Technical Specification LPCI flow with an open minimum flow valve. The test will be repeated on the other pumps to verify their ability to also satisfy the Technical Specification requirements. If the RHR system line up with an inoperable minimum flow valve open and deactivated is determined to be desirable, a written safety evaluation will be completed. If the pump cannot meet the flow criteria and the minimum flow valve becomes inoperable, then the pump will be declared inoperable.

Because testing is expected to provide an alternative to closing and deactivating the minimum flow valve, and because a closed, inoperable minimum flow valve will be considered to result in pump inoperability, a safety evaluation justifying pump operability with a closed, deactivated minimum flow valve is not required and will not be completed.

Should you require additional information, please do not hesitate to contact us.

Very truly yours,



cc: A. R. Blough, Site Inspector