March 20, 1985

DMB-016

Docket Nos. 50-277
and 50-278

LICENSEE: Philadelphia Electric Company

FACILITY: Peach Bottom Atomic Power Station, Units 2 and 3

SUBJECT: SUMMARY OF MEETING WITH PHILADELPHIA COMPANY ON PROPOSED PURGE/VENT TSs AND VAC BREAKER TSs AT PEACH BOTTOM ATOMIC STATION, UNITS 2 AND 3

Introduction

On February 26, 1985, the NRC staff met with representatives of Philadelphia Electric Company (the licensee) in Bethesda, Maryland to discuss proposed purge/vent valve Technical Specifications (TSs) changes as well as proposed TSs changes concerning verification of drywell-wetwell vacuum breaker closures at Peach Bottom Atomic Power Station, Units 2 and 3. The list of participants is included as Enclosure I.

Discussion

A. Purge/Vent Valves TS:

By letter dated November 21, 1984, the NRC staff requested a meeting with the licensee to discuss proposed TS changes in its January 4, 1984 amendment application. A proposed agenda which consisted of a review status of the licensee's amendment request was forwarded to the licensee at that time.

Based upon the agenda items transmitted to the licensee on November 24, 1984 (Enclosure 2), a summary of the meeting discussion is presented below:

1. The licensee was advised by the staff that TS 3.7.E.3 should specify precisely what safety related reasons will require purging/venting. Also, the Bases for this TS should provide the definition of 'deinerting' as applied by the licensee in this section.

2 and 3. The staff and the licensee discussed the proposed limitation of 90 hrs per year of purging/venting through SGTS by each unit. The licensee indicated that this issue will be studied again to determine if the 90 hrs limit will present operational problems.

4. This issue had been raised by the Region and reviewed and concurred in by the NRR staff. The licensee has undertaken an investigation of potential methods for determing leak tight integrity of the safety grade seal air supply system for the purge/vent valves. The results of the licensee's investigation will be forwarded to NRC in

six months. The staff expects in the licensee's upcoming revised submittal of its proposed purge/vent valve TS package a commitment from the licensee proposing resolution of the above issue.

5-10. The licensee and staff agreed that no further discussions were needed on these staff comments. The licensee will submit shortly a revised TS package which will address these issues, where appropriate.

B. Verification of Drywell - Suppression Chamber Vacuum Breaker Closure (Amendment Request)

The staff discussed with the licensee its TS amendment application dated April 2, 1984. The staff indicated that it had questions concerning the frequency of leak testing, and the lack of a provision for promptly repairing the deficient condition (eg., four hours) or initiating a leak test.

The licensee indicated that it would pursue the staff's comments in order to resolve this outstanding TS request. In addition, the licensee indicated that it would review the adequacy of permitting vacuum breakers to be not fully closed (open up to 3°) and still assure minimal containment bypass leakage.

Original signed by

Gerald E. Gears, Project Manager
Operating Reactors Branch #4
Division of Licensing

Enclosures:
1. List of Attendees
2. Proposed Agenda for Meeting

cc w/enclosures:
See next page

ORB#4:DL
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3/28/85

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MEETING SUMMARY DISTRIBUTION

Licensee: Philadelphia Electric Company

*Copies also sent to those people on service (cc) list for subject plant(s).

Docket File
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NRC Meeting Participants:

Peter S. Kapo
Jack Kudrick

Enclosure 1

PEACH BOTTOM PURGE/VENT TECHNICAL SPECIFICATION

MEETING FERRUARY 26, 1985

Peter S. Kapo	NRC
Gerry Gears	NRR
Jack Kudrick	NRC
Dave Helwig	PECO
Jim Mitman	PECO
Bill Birely	PECO
William M. Alden	PECO

ENCLOSURE 2

PROPOSED AGENDA FOR MEETING WITH PHILADELPHIA ELECTRIC COMPANY

REVIEW STATUS OF TECHNICAL SPECIFICATION AMENDMENT FOR THE CONTAINMENT PURGE/VENT SYSTEM AT PEACH BOTTOM UNITS 2 & 3

On 31 July 79 Philadelphia Electric COmpany (PECO) submitted a proposed Technical Specification (TS) for the containment purge/vent systems at Peach Bottom Units 2 & 3 (PB2 & PB3). We identified concerns with both the plant hardware and the proposed TS amendment. To resolve these concerns we have conducted ongoing negotiations with PECO. By December of 1983 the hardware problems were resolved, but problems with the proposed TS remained. At that time the proposed TS consisted of the original 1979 submittal plus a number of proposed amendments to this submittal. With these difficulties, we were unable to perform an effective review of PECO's proposed TS. In order to make the review manageable, via a letter dated 12 Dec 83, we requested PECO to (1) submit a complete purge/vent TS Amendment Application package, (2) make the proposed TS consistent with the STS, (3) point out any items that are different in the proposed TS and the STS and justify these differences, and (4) add provisions to the proposed TS to better protect the Standby Gas Treatment System (SGTS). PECO responded to our request with the submittal referenced in the cover memorandum. The submittal contained all four of the elements we had requested. We have reviewed the submittal, and in early October of 1984 we discussed our concerns with PECO via telecon. We agreed to formally document all issues raised in the telecon, and the purpose of this attachment is to provide that documentation.

It should be noted that our purge/vent STS were transmitted to PECO on 7 July 82. The STS transmitted was for a pressurized water reactor, rather than for a boiling water reactor (PB2 & PB3 are both boiling water reactors). Having the wrong STS caused quite a bit of confusion for PECO, but, nevertheless, they worked with this wrong STS and, despite the difficulties, did an admirable job of preparing their proposed purge/vent TS. We would like PECO to resubmit their TS Amendment Application, and with this in mind we are enclosing a copy of our boiling water reactor purge/vent STS and containment isolation valve STS as Attachment 2. This purge/vent STS has been specifically tailored to Peach Bottom, and we feel it would be useful to PECO in their redrafting of the proposed purge/vent TS. Our purge/vent STS is enclosed simply to provide PECO with useful guidence, and we are not in any way implying that we are requiring PECO to adopt all or any part of our purge/vent STS.

In the remainder of this memorandum we will discuss the specific findings of our review of the proposed purge/vent TS which we discussed in the telecon referenced above. We will discuss all issues which raised questions in the review, even if we have now concluded that these points have been adequately addressed. The first five issues are points in which the proposed purge/vent TS is at variance with the NRC position. The remainder of the issues can be regarded as suggestions of how the proposed purge/vent TS could be improved.

The first issue is that the phrase "other safety related reason" in specification 3.7.E.3 is unacceptable. It is an NRC position that safety related reasons for purging/venting shall be specifically stated in the TS. Inerting, deinerting, and pressure control are the three safety related reasons for purging/venting in the STS which require no justification from the licensee. If a licensee wishes to purge/vent for some other safety related reason, then this reason must be stated in the specification, and in the TS Amendment Application the justification for including this reason in the specification must be given.

The second issue is that the NRC position does not permit carry-over of purge/vent time from year to year. This provision must be removed from specification 3.7.E.2.a.

The third issue is that the NRC postion does not permit sharing of purge/vent time between units. Each unit should be permitted 90 hours per year of purging/venting through the SGTS. If a licensee can justify a need for more than 90 hours for a given unit he may write his specification accordingly and include the justification in his TS Amendment Application.

The fourth issue is that the NRC position requires a specification for the leak tight integrity of the safety grade seal air supply system. Normally the periodic testing consists of pressurizing the region between two closed and sealed valves and observing the rate of leakage past the seals. This testing demonstrates that there is no seal deterioration. With the Peach Bottom arrangement this type of periodic testing is not required. Since the seals are continuously pressurized seal integrity is demonstrated, however we still require that it be demonstrated with a leakage test that there be no seal deterioration associated with the safety grade seal air supply system. For this reason we require PEC to include a specification for the safety grade seal air supply system in their TS.

The fifth issue is a typographical error. The words "previously measured" should be inserted between the fourth and fifth lines of specification 4.7.E.2.

The sixth issue is the valve and penetration numbers in the proposed specification 3.7.E.2.b. These numbers are correct for PB2, but not for PB3. PEC should submit a separate specification for PB3.

The seventh issue is that we were originally confused by the valve and penetration numbers in specification 3.7.E.2.b. PEC provided a schematic drawing of the containment with all pertinent valves, peneterations, pipes, and ducts indicated, which resolved this item.

The eight issue is the applicability criteria for the purge/vent TS. In the STS the applicability criteria is that the reactor be in operating mode 1, 2, or 3. In the proposed TS the applicability criteria is that the reactor be critical, the reactor mode switch be in the "startup" or "run" position, and the reactor coolant pressure be greater that 100 psig. The proposed TS applicability criteria was approved in the Safety Evaluation Report attached to the letter from J. F. Stolz (NRC) to E. G. Bauer, Jr. (PEC) dated 12 Dec 83. Since this criteria has already been approved, PEC need not provide further justification.

The ninth issue is that specification 3.7.D is incomplete. Specification 3.7.D.1 states that all isolation valves and instrument line flow check valves listed in Table 3.7.1 shall be operable. This statement is followed by an action statement for the isolation valves, but no action statement is given for the check valves. An action statement for the check valves should be included in this specification. Specification 3.7.D.2 is the action statement for the isolation valves. It provides a procedure if one of a pair of isolation valves fails, but gives no indication of what should be done if both valves fail. We suggest that PEC compare their proposed TS with the STS to see an acceptable approach to this concern. Specification 3.7.D is not part of our review and we are not requesting PECO to take action on it at this time. This issue is included here simply because it was raised on the telecon.

The tenth issue is the surveillance requirements associated with the containment isolation control system. The sample TS on this issue (STS 4.6.3.2) provided to PEC by the NRC was based on the Westinghouse control system design and required verification, at least once per 18 months, that a Phase A and Phase B containment isolation test signal closes the Phase A and Phase B isolation valves, respectively. Since the Peach Bottom containment isolation control systems are based on the General Electric control system logic, the specific language of the sample TS provided by the staff would not be directly applicable to Peach Bottom. Peach Bottom TS 4.7.D.1.a currently requires a simulated automatic initiation of each valve, at least once per operating cycle. PEC has demonstrated to the satisfaction of the Instrumentation and Control Systems Branch that the current language of Peach Bottom TS 4.7.D.1.a provide conservative, plant specific surveillance requirements consistent with the guidance provided in the staff's sample TS cited above.