

PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

February 1, 1985

Docket Nos. 50-277
50-278

Mr. Hugh L. Thompson, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Generic Letter 83-28, "Required Actions
Based on Generic Implications of Salem
ATWS Events", July 8, 1983

REFERENCE: Letter, S. L. Daltroff, PECO, to
D. G. Eisenhut, USNRC, Follow-up Response
to Generic Letter 83-28, August 31, 1984

Dear Mr. Thompson:

This letter provides an update of Philadelphia Electric Company's progress for updating existing Maintenance Procedures and ensuring that the updated procedures contain the latest vendor information.

Attachment 1 to this letter specifies the procedures which have been updated and approved by the Plant Operations Review Committee. Attachment 2 specifies those Maintenance Procedures which have been deleted but will be retained as Special Procedures or Work Instructions. Attachment 3 is the current schedule for completion of this effort.

Philadelphia Electric Company has contracted the services of a consultant to review and update, as required, all safety-related vendor manuals used at Peach Bottom. This effort will result in updating approximately 500 non-NSSS vendor manuals and approximately 250 NSSS vendor manuals. In order to implement an effective program, the following tasks will be performed:

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- Review the "Peach Bottom Atomic Power Station Instruction Book Index Numerical Sort" and status of each Vendor Manual filed applicable to Peach Bottom Units 2 and 3.
- Identify and analyze modifications performed on the equipment appropriate to each manual using the "Status of Approved Items - Peach Bottom 2 and 3" and available site modification records.
- Identify and analyze documented information, if any, that has been added to each manual by PECO personnel.
- Contact vendors, where appropriate, to determine where manual revisions have been made, whether supplements or addenda have been issued, or if existing manuals are applicable.
- Establish an updated hard-copy Vendor Manual file with updated index at Peach Bottom and within the Engineering Design Division.

Preliminary scoping of the project indicates approximately 6 months will be required to update the manuals. It may be necessary to re-evaluate this schedule with further implementation of the program. The manual update program and the activities regarding the procedure update program will be coordinated to ensure manuals and procedures are consistent and eliminate duplication of effort in these tasks.

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

Very truly yours,



Attachments

cc: T. P. Johnson, Site Inspector

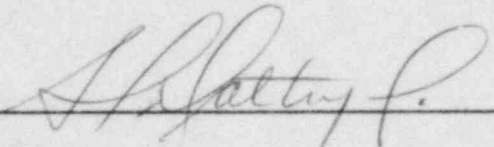
COMMONWEALTH OF PENNSYLVANIA :

: 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.



A handwritten signature in cursive script, appearing to read "S. L. Daltroff", is written over a horizontal line.

Subscribed and sworn to
before me this *1st* day
of *February* 1985

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	2/16/84
M-1.6	8	Relief Valve Replacement	6/13/84
M-1.25	3	MSIV Air Cylinder and Dashpot Maintenance	9/19/84
M-2.1	10	Reactor Recirculation Pump Seal Overhaul	6/13/84
M-3.1	17	Control Rod Drive Replacement	5/25/84
M-4.2	13	Opening the Reactor Vessel	4/25/84
M-4.10	5	TIP Drive Maintenance	12/26/84
M-4.12	2	SRM/IRM Drive Maintenance	8/15/84
M-4.28	2	CRD Thermal Sleeve Removal	12/26/84
M-4.68	3	TIP Indexer Maintenance	12/26/84
M-4.36	8	Steam Line Plug Installation	4/25/84
M-4.51	6	Removal of Drywell Head	4/25/84
M-4.52	7	Removal of Reactor Vessel Head	4/30/84
M-9.1	11	Limiter Switches Inspection, Maintenance, Adjustment, Lubrication	5/23/84
M-10.16	2	Residual Heat Removal (RHR) Pump Mechanical Seal Maintenance	11/5/84
M-11.1	3	Standby Liquid Control Pump Maintenance	9/12/84
M-11.3	3	Standby Liquid Control Accumulator Maintenance	11/28/84
M-13.1	4	Reactor Core Isolation Cooling (RCIC) Turbine Maintenance	7/13/84
M-14.1	4	Core Spray Pump Maintenance	5/18/84

Updated Procedures Approved by the Plant Operations Review Committee

<u>PROCEDURE</u>	<u>REV.</u>	<u>TITLE</u>	<u>DATE APPROVED</u>
M-23.5	2	HPCI Check Valves Maintenance (Valves 32, 61, 65)	6/1/84
M-52.2	16	Diesel Engine Maintenance	8/1/84
M-52.14	1	Diesel Turbocharger Inspection	7/6/84
M-4.12	2	SRM/IRM Detector Drive Maintenance	8/15/84

Deleted Maintenance Procedures Approved by the Plant Operations Review
Committee - Retained as Special Procedures or Work InstructionTITLE

M-1.4	Relief Valve Pilot Repair
M-1.9	Reactor Vessel Safety Valve Seat Repair
M-1.11	Reactor Vessel Safety Valve Seat Inspection & Test
M-1.14	Moisture Separator Drain Tank Manway Gasket Installation
M-1.15	Main Steam Drywell Penetration Bellows Repair
M-1.16	Main Steam Drywell Penetration Weld Repair
M-1.17	Main Steam Drywell Penetration Inboard Bellows Repair
M-1.21	Relief Valve Base Assembly Replacement
M-1.22	Main Steam Drywell Penetration Bellows Repair
M-1.26	Outboard MSIV Wiring Repair Unit 2
M-2.10	Recirc. Pump Suction Line Pressure Tap Test
M-2.11	Recirc. Pump Discharge Line Vent Line-Capping & Plugging
M-3.12	Control Rod Drive Support Steel Adjustment
M-4.11	Installation & Removal of In-Vessel Rack
M-4.13	Tip System Ball Valve Spring Adjustment
M-4.14	SRM or IRM Gear-boy Realignment
M-4.25	Instrument Handling Tool Air Cylinder Replacements
M-4.26	Fuel Support Caseing Grapple Repair
M-4.29	CRD Thermal Sleeve Installation
M-4.35	Installation and Removal of Jet Pump Seal Plugs
M-4.38	Vibration Instrumentation Sensor & Hardware Removal
M-4.43	Coating Repairs to the Refueling Floor
M-4.72	Removal of Surveillance Specimen
M-5.1	Visual Inspection Valves
M-6.2	Feedwater Long Path Recirc. Valve Maintenance
M-6.3	28A Drain Valves Replacement
M-6.4	Feedwater Sample Probe Removal
M-6.5	Feedwater Sample Probe Inspection

Deleted Maintenance Procedures Approved by the Plant Operations Review
Committee - Retained as Special Procedures or Work Instruction

	<u>TITLE</u>
M-8.3	Off-Gas Filter Maintenance
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-8.7	Recombiner Heat Exchanger Maintenance
M-10.4	MO-89 Valve Inspection
M-10.5	MO-89 Valve Seat Repair
M-10.7	3-10-89B Valve Repair
M-10.10	RV35B Repair
M-10.12	M-154 Disc & Skirt Repair
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-12.2	RWCU Heat Exchanger Maintenance
M-12.3	RWCU Pump Vent Piping Replacement
M-12.22	RWCU System Bypass Line Flange Installation
M-14.3	Core Spray Line Repair - A&B Loops
M-14.4	Core Spray Line Non-Destructive Test Weld Prep. and Verification - A&B Loops
M-14.5	Core Spray Line Weld 14-1-20 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 - RO Blank Installation
M-19.1	Fuel Pool Filter Demineralizer Maintenance
M-23.1	HPCI Pump Drive Turbine Maintenance

Deleted Maintenance Procedures Approved by the Plant Operations Review
Committee - Retained as Special Procedures or Work Instruction

TITLE

M-23.21	1.3 HP 230 FVC Valdor Motor Reconditioning for HPCI Condensate Pump
M-23.6	HPCI Turbine Control Valve Linkage Modification
M-23.8	HPCI Turbine Speed Sensing Gear Locking Mechanism
M-32.6	HPSW Pipe Spool Repair

Tentative Procedure Review Schedule

PRIORITY GROUP 2

COMPLETE BY: 4/1/85

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-8.5	Recombiner Compressor Maintenance
M-9.2	ASCO Valve Repair
M-12.1	Reactor Water Clean-Up (RWCU) Pump Maintenance
M-13.3	Reactor Core Isolation Cooling (RCIC) Pump Maintenance.
M-33.1	Emergency Service Water (ESW) Pump Maintenance

Tentative Procedure Review Schedule

PRIORITY GROUP 2 (cont'd)

COMPLETE BY: 7/1/85

- 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

Tentative Procedure Review Schedule

PRIORITY GROUP 3

COMPLETE BY: 7/1/85

- M-3.9 Replacement of CRD Ball Check
- M-4.34 Reactor Vessel Stabilizers Inspection and Repairs
- M-4.41 Reactor Vessel Stabilizers - Inspection and Minor Adjustments
- M-4.42 Electrical Heating of Reactor Vessel Head
- M-4.70 Unit 3 Emergency Hoist Operation

COMPLETE AND SUBMITTED BY: 8/1/85

- M-7.1 Visual Inspection of Vacuum Breakers
- M-7.2 Torus Coating - Touch-Up
- M-8.4 Recombiner Cartridge Replacement
- M-10.3 RHR Valve MO-154 Repair
- M-10.12 MO-154 Disc and Skirt Repair
- M-11.2 Standby Liquid Control Explosive Valve Replacement

Tentative Procedure Review Schedule

PRIORITY GROUP 3 (cont'd)

COMPLETE AND SUBMITTED BY: 8/1/85

- 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-14.7 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 BY: 10/1/85

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: 11/1/85
- 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 Governor Change
M-52.9	Diesel Generator Turbosupercharger Inlet Filter Silencer Assembly Repair
M-57.1	125 DC Equipment Maintenance
M-57.2	24V DC Equipment Maintenance
M-57.3	125 Volt and 24 Volt Battery Corrective 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

COMPLETION BY: 12/1/85

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

Tentative Procedure Review Schedule

PRIORITY GROUP 5

COMPLETED BY: 1/1/86

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 BY: 2/1/86

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 BY: 3/1/86

- 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 BY: 12/31/86

Review of Approximately 135 Remaining Procedures