

# PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET  
P.O. BOX 8699  
PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

January 31, 1985

Docket Nos. 50-277  
50-278

Mr. John F. Stolz, Chief  
Operating Reactors Branch #4  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Peach Bottom Atomic Power Station  
Units 2 and 3 - Second 120-Month Inservice  
Inspection (ISI) Program

REFERENCE: (1) Letter, J. F. Stolz, USNRC, to  
E. G. Bauer, Jr., PECO, dated October 29, 1984  
(2) Letter, S. L. Daltroff, PECO, to  
J. F. Stolz, USNRC, dated December 21, 1984

Dear Mr. Stolz:

This letter is submitted as a follow-up to the Reference (2) letter in response to requests by the NRC for additional information regarding the second 120-month ISI program for Peach Bottom Units 2 and 3.

The requests for additional information in the Reference (1) letter, which we committed to respond to at this time, are as restated below along with our response.

REQUEST 3. Section 2.2.2 of the Program (p 2-5)

This section lists three areas of Class 1 piping in which it may be impossible to obtain complete volumetric examinations on some welds. These areas are described below:

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- a. Areas within the containment penetrations,
- b. Cast fittings and structures that are not amenable to UT examination or in a system that cannot be drained without draining the RPV, and
- c. Any weld that, during the preservice examination (PSI), was found unsuitable for UT examination (and continuous evaluation indicates that the state-of-the-art techniques do not allow UT examination) and that cannot be radiographed due to (1) geometry and/or interference from surrounding structures or (2) the systems cannot be drained without draining the RPV.

For those welds that are known to present limitations to examination (such as those inside containment penetrations), please provide specific relief requests.

RESPONSE

The category B-J (Pressure Retaining Welds in Class 1 Piping) and category B-K-1 (Integrally welded Attachments for Class 1 Piping) which present limitations to examination are summarized in Attachment 1 to this letter along with appropriate relief requests. The relief requests are numbered so as to be consistent with other relief requests for the Class 1 Section XI program.

REQUEST

6. 2.4.4 Relief Request on Class 1 System Hydrostatic Testing (p 2-13)
  - (a) Please show why the relief valves of lowest setting cannot be gagged shut for performance of hydrostatic tests.

RESPONSE

The Target Rock technical manual for model 67F safety/relief valves describes a bench test gagging method for 90% of set point (904.5 psig) utilizing a special gagging tool. The technical manual also cautions against exceeding this pressure. By letter dated December 18, 1984, Philadelphia Electric Company has requested Target Rock to

Mr. John F. Stolz

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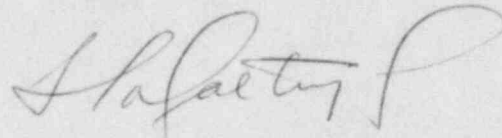
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evaluate whether the safety-relief valve can be properly and safely gagged for an inservice hydrostatic test at 1085 psig.

We are expecting a written reply from Target Rock by February 7, 1985, after which we will forward the results of the evaluation to the Commission.

If any further information is required to complete your review, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "S. H. Taylor".

Attachment

cc: Mr. T. P. Johnson, Resident Site Inspector

ATTACHMENT 1

TABLE 2.2.2

UNIT 2 CLASS I COMPONENTS AND WELDS FOR WHICH CODE RELIEF IS REQUESTED

<u>Section XI Item No.</u>	<u>Section XI Category</u>	<u>Weld Number</u>	<u>Method</u>	<u>Percent Not Accessible</u>	<u>Relief Request</u>
B9.12	B-J	1-A-7LD	Vol/Sur	62.5	2.4.6
B9.11	B-J	1-A-8	Vol/Sur	52.7	2.4.6
B9.12	B-J	1-A-8LD	Vol/Sur	100	2.4.6
B9.11	B-J	1-A-9	Vol/Sur	60	2.4.6
B9.12	B-J	1-A-9LU	Vol/Sur	100	2.4.6
B9.11	B-J	1-B-10	Vol/Sur	26	2.4.6
B9.12	B-J	1-B-10LU	Vol/Sur	100	2.4.6
B9.11	B-J	1-A-11A	Vol/Sur	100	2.4.6
B9.12	B-J	1-A-11ALD	Vol/Sur	100	2.4.6
B9.12	B-J	1-A-11ALUI	Vol/Sur	30	2.4.6
B9.12	B-J	1-A-11ALUO	Vol/Sur	30	2.4.6
B9.11	B-J	1-A-12	Vol/Sur	100	2.4.8
B9.12	B-J	1-A-12LU	Vol/Sur	100	2.4.6
B9.11	B-J	1-A-13	Vol/Sur	100	2.4.8
B9.12	B-J	1-A-15LU	Vol/Sur	25	2.4.6
B9.11	B-J	1-B-4	Vol/Sur	18	2.4.6
B9.11	B-J	1-B-7	Vol/Sur	14	2.4.6
B9.12	B-J	1-B-7LD	Vol/Sur	100	2.4.6
B9.12	B-J	1-B-8LU	Vol/Sur	100	2.4.6

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B9.12	B-J	1-B-9LD	Vol/Sur	100	2.4.6
B9.11	B-J	1-B-14	Vol/Sur	50	2.4.6
B9.12	B-J	1-B-14LD	Vol/Sur	100	2.4.6
B9.11	B-J	1-B-15	Vol/Sur	100	2.4.8
B9.12	B-J	1-B-15LU	Vol/Sur	33	2.4.6
B9.11	B-J	1-B-16	Vol/Sur	100	2.4.8
B9.12	B-J	1-B-18LU	Vol/Sur	25	2.4.6
B9.11	B-J	1-C-7	Vol/Sur	27	2.4.6
B9.12	B-J	1-C-7LD	Vol/Sur	100	2.4.6
B9.11	B-J	1-C-8	Vol/Sur	27	2.4.6
B9.12	B-J	1-C-8LU	Vol/Sur	100	2.4.6
B9.11	B-J	1-C-10	Vol/Sur	26	2.4.6
B9.12	B-J	1-C-10LU	Vol/Sur	100	2.4.6
B9.12	B-J	1-C-14LD	Vol/Sur	100	2.4.6
B9.12	B-J	1-C-15LU	Vol/Sur	25	2.4.6
B9.12	B-J	1-C-18LU	Vol/Sur	50	2.4.6
B9.11	B-J	1-D-8	Vol/Sur	50	2.4.6
B9.12	B-J	1-D-8LD	Vol/Sur	100	2.4.6
B9.11	B-J	1-D-9	Vol/Sur	50	2.4.6
B9.12	B-J	1-D-9LU	Vol/Sur	100	2.4.6

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B9.11	B-J	1-D-11A	Vol/Sur	100	2.4.6
B9.12	B-J	1-D-11ALUI	Vol/Sur	100	2.4.6
B9.12	B-J	1-D-11ALUO	Vol/Sur	100	2.4.6
B9.11	B-J	1-D-12	Vol/Sur	100	2.4.8
B9.11	B-J	1-D-13	Vol/Sur	100	2.4.8
B9.12	B-J	1-D-15LU	Vol/Sur	25	2.4.6
B9.12	B-J	1-D-17LD	Vol/Sur	100	2.4.6
B9.11	B-J	6-BSU-3	Vol/Sur	100	2.4.7
B9.11	B-J	10-IA-2	Vol/Sur	100	2.4.7
B9.11	B-J	10-IA-2A	Vol/Sur	100	2.4.5
B9.11	B-J	10-IA-2B	Vol/Sur	100	2.4.5
B9.11	B-J	10-IB-2	Vol/Sur	100	2.4.7
B9.11	B-J	10-0-16A	Vol/Sur	100	2.4.5
B9.11	B-J	10-0-16B	Vol/Sur	100	2.4.5
B10.10	B-K-1	1-A-5HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	1-A-7RL-1	Sur	40	2.4.11
B10.10	B-K-1	1-A-7RL-2	Sur	40	2.4.11
B10.10	B-K-1	1-A-7RL-3	Sur	40	2.4.11

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B10.10	B-K-1	1-A-11HL-1 Thru 4	Sur	100	2.4.9
B10.10	B-K-1	1-A-13CL	Sur	50	2.4.9
B10.10	B-K-1	1-B-5HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	1-B-5RL-1	Sur	40	2.4.11
B10.10	B-K-1	1-B-7RL-1	Sur	40	2.4.11
B10.10	B-K-1	1-B-7RL-2	Sur	40	2.4.11
B10.10	B-K-1	1-B-7RL-3	Sur	40	2.4.11
B10.10	B-K-1	1-B-9RL-1	Sur	40	2.4.11
B10.10	B-K-1	1-B-9RL-2	Sur	40	2.4.11
B10.10	B-K-1	1-B-14HL-1 Thru 4	Sur	100	2.4.9
B10.10	B-K-1	1-B-16CL	Sur	50	2.4.9
B10.10	B-K-1	1-C-5HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	1-C-5RL-1	Sur	40	2.4.11
B10.10	B-K-1	1-C-7RL-1	Sur	40	2.4.11
B10.10	B-K-1	1-C-7RL-2	Sur	40	2.4.11
B10.10	B-K-1	1-C-7RL-3	Sur	40	2.4.11
B10.10	B-K-1	1-C-9RL-1	Sur	40	2.4.11
B10.10	B-K-1	1-C-9RL-2	Sur	40	2.4.11

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B10.10	B-K-1	1-C-14HL-1 Thru 4	Sur	100	2.4.9
B10.10	B-K-1	1-C-16CL	Sur	50	2.4.9
B10.10	B-K-1	1-D-5HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	1-D-7RL-1	Sur	40	2.4.11
B10.10	B-K-1	1-D-7RL-2	Sur	40	2.4.11
B10.10	B-K-1	1-D-7RL-3	Sur	40	2.4.11
B10.10	B-K-1	1-D-11HL-1 Thru 4	Sur	100	2.4.9
B10.10	B-K-1	1-D-13CL	Sur	50	2.4.9
B10.10	B-K-1	6-A-12HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	6-A-4HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	6-A-9CL	Sur	50	2.4.9
B10.10	B-K-1	6-AA-5HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	6-AB-1HL-2 Thru 5	Sur	20	2.4.10
B10.10	B-K-1	6-AC-4HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	6-ASU-1HL-1 Thru 4	Sur	20	2.4.10



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B10.10	B-K-1	6-B-11HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	6-B-3HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	6-B-8CL 1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	6-BD-4HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	6-BE-1HL-1 Thru 5	Sur	20	2.4.10
B10.10	B-K-1	6-BF-3HL 1 Thru 5	Sur	20	2.4.10
B10.10	B-K-1	6-BSU-1HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	10-HS-12HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	10-HS-17HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	10-HS-3CL 1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	10-IA-2CL 1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	10-IB-2CL 1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	10-0-16CL 1 Thru 4	Sur	50	2.4.9

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B10.10	B-K-1	12-O-20HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	12-O-31-HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	12-O-34CL 1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	14-A-12HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	14-A-3CL 1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	14-A-37HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	14-B-11HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	14-B-3CL 1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	14-B-35HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	23-O-11HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	23-O-17CL 1 Thru 4	Sur	50	2.4.9

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B9.12	B-J	1-A-7LD	Vol/Sur	33	2.4.6
B9.11	B-J	1-A-9	Vol/Sur	50	2.4.6
B9.11	B-J	1-A-11A	Vol/Sur	100	2.4.6
B9.12	B-J	1-A-11ALD	Sur/Vol	80	2.4.6
B9.12	B-J	1-A-11ALUO	Vol/Sur	40	2.4.6
B9.11	B-J	1-A-12	Vol/Sur	100	2.4.8
B9.11	B-J	1-A-13	Vol/Sur	35	2.4.8
B9.12	B-J	1-A-13LD	Vol/Sur	80	2.4.6
B9.11	B-J	1-B-7	Vol/Sur	15	2.4.8
B9.12	B-J	1-B-7LD	Vol/Sur	75	2.4.6
B9.12	B-J	1-B-8LU	Vol/Sur	100	2.4.6
B9.11	B-J	1-B-9	Vol/Sur	10	2.4.8
B9.12	B-J	1-B-10LU	Vol/Sur	100	2.4.6
B9.12	B-J	1-B-12LU	Vol/Sur	33	2.4.6
B9.11	B-J	1-B-14	Vol/Sur	100	2.4.6
B9.12	B-J	1-B-14LD	Vol/Sur	80	2.4.6
B9.11	B-J	1-C-7	Vol/Sur	30	2.4.8
B9.12	B-J	1-C-7LD	Vol/Sur	100	2.4.6
B9.11	B-J	1-C-8	Vol/Sur	30	2.4.8
B9.12	B-J	1-C-8LU	Vol/Sur	100	2.4.6

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B9.11	B-J	1-C-9	Vol/Sur	25	2.4.8
B9.11	B-J	1-C-10	Vol/Sur	30	2.4.6
B9.12	B-J	1-C-10LU	Vol/Sur	100	2.4.6
B9.12	B-J	1-C-14LD	Vol/Sur	80	2.4.6
B9.12	B-J	1-D-7LD	Vol/Sur	65	2.4.6
B9.11	B-J	1-D-9	Vol/Sur	5	2.4.6
B9.11	B-J	1-D-11A	Vol/Sur	100	2.4.6
B9.12	B-J	1-D-11A-LUO	Vol/Sur	50	2.4.6
B9.12	B-J	1-D-11ALD	Vol/Sur	40	2.4.6
B9.11	B-J	6-A-17	Vol/Sur	10	2.4.8
B9.11	B-J	6-A-3	Vol/Sur	5	2.4.7
B9.11	B-J	10-IA-2	Vol-Sur	100	2.4.7
B9.11	B-J	10-IA-2A	Vol/Sur	100	2.4.5
B9.11	B-J	10-IB-2	Vol/Sur	100	2.4.7
B9.11	B-J	10-IB-2A	Vol/Sur	100	2.4.5
B9.11	B-J	10-0-16A	Vol/Sur	100	2.4.5
B9.11	B-J	10-0-16B	Vol/Sur	100	2.4.5
B10.10	B-K-1	1-A-5HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	1-A-7RL-1-1	Sur	40	2.4.11

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B10.10	B-K-1	1-A-7RL-1-2	Sur	40	2.4.11
B10.10	B-K-1	1-A-7RL-2-1	Sur	40	2.4.11
B10.10	B-K-1	1-A-7RL-2-2	Sur	40	2.4.11
B10.10	B-K-1	1-A-7RL-3-1	Sur	40	2.4.11
B10.10	B-K-1	1-A-7RL-3-2	Sur	40	2.4.11
B10.10	B-K-1	1-A-11HL-1 Thru 4	Sur	100	2.4.9
B10.10	B-K-1	1-A-13CL-1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	1-B-5HL-1 Thru 4	Vol/Sur	20	2.4.10
B10.10	B-K-1	1-B-5RL-1-1	Sur	40	2.4.11
B10.10	B-K-1	1-B-5RL-1-2	Sur	40	2.4.11
B10.10	B-K-1	1-B-7RL-1-1	Sur	40	2.4.11
B10.10	B-K-1	1-B-7RL-1-2	Sur	40	2.4.11
B10.10	B-K-1	1-B-7RL-2-1	Sur	40	2.4.11
B10.10	B-K-1	1-B-7RL-2-2	Sur	40	2.4.11
B10.10	B-K-1	1-B-7RL-3-2	Sur	40	2.4.11
B10.10	B-K-1	1-B-7RL-4-1	Sur	40	2.4.11
B10.10	B-K-1	1-B-7RL-4-2	Sur	40	2.4.11
B10.10	B-K-1	1-B-9RL-1-1	Sur	40	2.4.11

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<u>Section XI Item No.</u>	<u>Section XI Category</u>	<u>Weld Number</u>	<u>Method</u>	<u>Percent Not Accessible</u>	<u>Relief Request</u>
B10.10	B-K-1	1-B-9RL-1-2	Sur	40	2.4.11
B10.10	B-K-1	1-B-9RL-2-1	Sur	40	2.4.11
B10.10	B-K-1	1-B-9RL-2-2	Sur	40	2.4.11
B10.10	B-K-1	1-B-14HL-1 Thru 4	Sur	100	2.4.9
B10.10	B-K-1	1-B-16CL-1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	1-C-5HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	1-C-5RL-1-1	Sur	40	2.4.11
B10.10	B-K-1	1-C-5RL-1-2	Sur	40	2.4.11
B10.10	B-K-1	1-C-7RL-1-2	Sur	40	2.4.11
B10.10	B-K-1	1-C-7RL-2-1	Sur	40	2.4.11
B10.10	B-K-1	1-C-7RL-2-2	Sur	40	2.4.11
B10.10	B-K-1	1-C-7RL-3-1	Sur	40	2.4.11
B10.10	B-K-1	1-C-7RL-3-2	Sur	40	2.4.11
B10.10	B-K-1	1-C-7RL-4-1	Sur	40	2.4.11
B10.10	B-K-1	1-C-7RL-4-2	Sur	40	2.4.11
B10.10	B-K-1	1-C-9RL-1-1	Sur	40	2.4.11
B10.10	B-K-1	1-C-9RL-1-2	Sur	40	2.4.11
B10.10	B-K-1	1-C-9RL-2-1	Sur	40	2.4.11

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B10.10	B-K-1	1-C-9RL-2-2	Sur	40	2.4.11
B10.10	B-K-1	1-C-14HL-1 Thru 4	Sur	100	2.4.9
B10.10	B-K-1	1-C-16CL-1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	1-D-11HL-1 Thru 4	Sur	100	2.4.9
B10.10	B-K-1	1-D-13CL-1 Thru 4	Sur	50	2.4.17
B10.10	B-K-1	1-D-5HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	1-D-7RL-1-1	Sur	40	2.4.11
B10.10	B-K-1	1-D-7RL-1-2	Sur	40	2.4.11
B10.10	B-K-1	1-D-7RL-2-1	Sur	40	2.4.11
B10.10	B-K-1	1-D-7RL-2-2	Sur	40	2.4.11
B10.10	B-K-1	1-D-7RL-3-1	Sur	40	2.4.11
B10.10	B-K-1	1-D-7RL-3-2	Sur	40	2.4.11
B10.10	B-K-1	6-A-12HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	6-A-4HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	6-A-9CL-1 Thru 4	Sur	50	2.4.9

ATTACHMENT 1

TABLE 2.2.2

UNIT 2 CLASS I COMPONENTS AND WELDS FOR WHICH CODE RELIEF IS REQUESTED

<u>Section XI Item No.</u>	<u>Section XI Category</u>	<u>Weld Number</u>	<u>Method</u>	<u>Percent Not Accessible</u>	<u>Relief Request</u>
B10.10	B-K-1	6-AA-3HL-1 Thru 5	Sur	20	2.4.10
B10.10	B-K-1	6-AB-1HL-1 Thru 5	Sur	20	2.4.10
B10.10	B-K-1	6-AC-1HL-1 Thru 8	Sur	20	2.4.10
B10.10	B-K-1	6-ASU-1HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	6-B-11HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	6-B-3HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	6-B-8CL-1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	6-BD-4AHL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	6-BE-1HL-1 Thru 5	Sur	20	2.4.10
B10.10	B-K-1	6-BSU-1HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	10-HS-12HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	10-HS-3CL 1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	10-IA-2CL-1 Thru 4	Sur	50	2.4.9



ATTACHMENT 1

TABLE 2.2.2

UNIT 2 CLASS I COMPONENTS AND WELDS FOR WHICH CODE RELIEF IS REQUESTED

<u>Section XI Item No.</u>	<u>Section XI Category</u>	<u>Weld Number</u>	<u>Method</u>	<u>Percent Not Accessible</u>	<u>Relief Request</u>
B10.10	B-K-1	10-IB-2CL-1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	10-0-16CL-1 Thru 4	Sur	20	2.4.9
B10.10	B-K-1	12-0-20HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	12-0-35HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	12-0-37CL 1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	14-A-10HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	14-A-3CL 1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	14-A-38HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	14-B-11HL-1 Thru 4	Sur	20	2.4.10
B10.10	B-K-1	14-B-3CL 1 Thru 4	Sur	50	2.4.9
B10.10	B-K-1	14-B-36HL-1 Thru 4	Sur	20	2.4.10

2.4.5 Request for Relief

2.4.5.1 Components

Class 1 Category B-J Pressure Retaining welds in piping.

2.4.5.2 Requirement from which Relief Requested

Table IWB-2500-1, Category B-J, Items B9.11 and B9.12, requires volumetric and surface examination of circumferential and longitudinal welds in piping of nominal pipe size  $\geq$  4 in.

2.4.5.3 Justification

Subject welds are physically inaccessible for examination due to containment penetrations.

2.4.5.4 Alternate to Section XI Requirements

Piping at the end of containment penetrations will be visually examined during routine system leakage and hydrostatic pressure test.

2.4.6 Request for Relief

2.4.6.1 Components

Class 1, Category B-J, Pressure Retaining welds in piping.

2.4.6.2 Requirement from which Relief Requested

Table IWB-2500-1, Category B-J, Items B9.11 and B9.12, requires volumetric and surface examination of circumferential and longitudinal welds in piping of nominal size  $\geq$  4 in.

2.4.6.3 Justification

Subject welds are entirely or partially obstructed from examination due to whip restraints, pipe supports, or containment penetration lugs.

2.4.6.4 Alternate to Section XI Requirements

Partial examinations will be performed at accessible weld locations. Inaccessible weld locations will be visually examined during routine system leakage and hydrostatic pressure tests.

2.4.7 Request for Relief

2.4.7.1 Components

Class 1, Category B-J, Pressure Retaining welds in piping.

2.4.7.2 Requirement from which Relief Requested

Table IWB-2500-1, Category B-J, Item 9.11, requires volumetric and surface examination of circumferential and longitudinal welds in piping and nominal size  $\geq$  4 in.

2.4.7.3 Justification

Subject welds cannot be examined due to material design configuration (ie., valve to containment penetration).

2.4.7.4 Alternate to Section XI Requirements

A visual examination will be performed during routine system leakage and hydrostatic pressure tests.

2.4.8 Request for Relief

2.4.8.1 Components

Class 1, Category B-J, Pressure Retaining welds in piping

2.4.8.2 Requirement from which Relief Requested

Table IWB-2500-1, Category B-J, Items 9.11 and 9.12, requires volumetric and surface examination of circumferential and longitudinal welds in piping of nominal size  $\geq$  4 in.

2.4.8.3 Justification

Subject welds cannot be examined from one side due to material and/or design configuration and, in addition, the other side is partially obstructed (ie., valve to pipe with support lug).

2.4.8.4 Alternate to Section XI Requirements

Partial examinations will be performed at accessible weld locations. Inaccessible weld locations will be visually examined during routine system leakage and hydrostatic pressure tests.

2.4.9 Request for Relief

2.4.9.1 Components

Class 1, Category B-J, Pressure Retaining welds in piping.

2.4.9.2 Requirement from which Relief Requested

Table IWB-2500-1, Category B-J, Items 9.11 and 9.12, requires volumetric and surface examination of circumferential and longitudinal welds in piping of nominal size  $\geq$  4 in.

2.4.9.3 Justification

Subject welds are entirely or partially obstructed from examination due to whip restraints, or containment penetrations.

2.4.9.4 Alternate to Section XI Requirements

Partial examinations will be performed at accessible weld locations. Inaccessible weld locations will be visually examined during routine system leakage and hydrostatic pressure tests.

2.4.10 Request for Relief

2.4.10.1 Components

Class 1, Category B-J, Pressure Retaining welds in piping.

2.4.10.2 Requirement from which Relief Requested

Table IWB-2500-1, Category B-J, Items 9.11 and 9.12, require volumetric and surface examination of circumferential and longitudinal welds in piping of nominal size  $\geq$  4 in.

2.4.10.3 Justification

Subject welds are partially obstructed from examination due to position of pipe clamp. To perform an entire examination on these hanger lugs would necessitate removing the clamp from the pipe.

This disassembly would involve performing an engineering analysis to ensure proper support of pipe, and in addition, a temporary support may have to be installed.

A job of this scope represents an unnecessary risk of an industrial accident, radiation exposure, and extensive expense, solely to perform approximately 20% of the required examination.

In view of the minimal benefits to be obtained, it is concluded that this code requirement is impractical at Peach Bottom.

2.4.10.4 Alternate to Section XI Requirements

Partial examinations will be performed at the accessible weld locations. Inaccessible weld locations will be examined in entirety if the clamp is removed for maintenance or other reasons, otherwise a visual examination will be performed during routine leakage and hydrostatic test.

2.4.11 Request for Relief

2.4.11.1 Components

Class 1, Category B-J, Pressure Retaining welds in piping.

2.4.11.2 Requirement from which Relief Requested

Table IWB-2500-1, Category B-J, Item B9.11, requires volumetric and surface examinations of circumferential and longitudinal welds in piping of nominal size  $\geq$  4 in.

2.4.11.3 Justification

Subject welds are partially obstructed from examination due to insufficient space between adjacent lug.

2.4.11.4 Alternate to Section XI Requirements

Partial examinations will be performed at accessible weld locations. Inaccessible weld locations will be visually examined during routine system leakage and hydrostatic pressure tests.