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February 1, 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 - Inservice Inspection (ISI) Program
First 120-Month Interval Program

REFERENCE: Letter, J. F. Stolz (USNRC) to E. G. Bauer, Jr.,
(PECo) dated October 29, 1984

Dear Mr. Stolz:

The reference letter requested Philadelphia Electric Company to submit additional relief requests applicable to the first 120-month ISI program in accordance with 10 CFR 50.55a(g)(5)(iv). Subsequently, additional relief requests were submitted to the Commission in a letter dated December 21, 1984, S. L. Daltroff, PECo, to J. F. Stolz, USNRC.

In preparation for the performance of certain Class 2 System hydrostatic tests in accordance with the 1974 Edition through Summer 1975 Addenda of Section XI of the ASME code, we have identified one additional relief request for NRC consideration. The relief request is as stated below.

1.0 Request for Relief

1.1 Components

High Pressure Coolant Injection (HPCI) System and
Reactor Core Isolation Cooling (RCIC) System - (ASME
Code Class 2)

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1.2 Requirement from Which Relief Requested

System Pressure test in accordance with Article IWC-5000 with inspection per IWA-5000.

1.3 Justification

To perform the system hydrostatic pressure test to the 1974 Code requirements, it would be necessary to run the HPCI turbine driven booster pump/main pump combination or RCIC turbine driven pump for a minimum of four hours before performing the required inspection in accordance with IWA-5000. During the four-hour run time, the system hydrostatic test pressure would be held at 100% of the nominal system operating pressure of 1,200 psig.

Except for approximately 20 feet of pipe in each system in the outboard main steam isolation valve (MSIV) room, the HPCI and RCIC pump discharge piping is uninsulated. The 1974 Edition of the Code did not recognize that a four-hour hold time for hydrostatic testing of uninsulated pipe is not required. However, the 1980 Edition of Section XI of the ASME Code recognizes that a four-hour hold time for uninsulated pipe is not required and that a hold time of ten minutes is sufficient for uninsulated piping systems. However, the 1980 Edition of the Code requires the system hydrostatic pressure test to be 1.10 times the system design pressure for the HPCI and RCIC systems.

These systems are designed to inject water into the vessel at a pressure equivalent to the highest pressure achieved in the reactor vessel during an operational transient which requires HPCI or RCIC system operation. This pressure is 1,275 psig which can result from an MSIV closure with a high flux scram. Therefore, the system hydrostatic test pressure required, in accordance with IWC-5222(a) of the 1980 Edition of the Code, would be 1,403 psig.

Complying with the 1974 version of this Code would necessitate significantly longer test runs resulting in unnecessary wear and tear on the HPCI and RCIC pumps and on the Residual Heat Removal system pumps which must operate in the torus water cooling mode for at least the same period of time. The requested relief would therefore obviate the need for more than sixteen hours of aggregate ECCS equipment operation per unit.

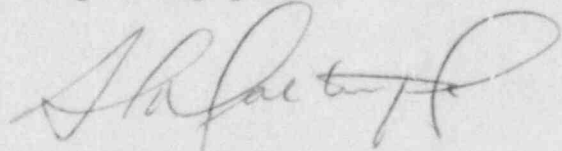
1.4 Testing in Lieu of Section XI Requirements

The HPCI and RCIC system hydrostatic pressure test will be performed at a discharge pressure of 1,403 psig with a hold time of ten minutes in accordance with IWC-5000 with inspection per IWA-5000 as specified in Section XI of the 1980 Edition of the ASME code.

The insulated portion of these systems will be hydrostatically tested using a hydrostatic test pump maintaining the test pressure at 1,403 psig for four hours in accordance with IWC-5000 with inspection per IWA-5000 as specified in Section XI of the 1980 Edition of the ASME Code.

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

Very truly yours,



Attachments

cc: T. P. Johnson, Resident Inspector