

DMB 016

FEB 11 1985

Dockets Nos. 50-277
and 50-278

Mr. Edward G. Bauer, Jr.
Vice President and General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

Subject: NUREG-0737, Item II.F.2, Inadequate Core Cooling Instrumentation

On October 26, 1984, the NRC staff sent Generic Letter No. 84-23 (Reactor Vessel Water Level Instrumentation in BWRs) to Philadelphia Electric Company and other BWR licensees. This Generic Letter outlined the importance of reactor vessel water level instrumentation in BWRs. The staff concluded that permanent physical improvements should be made on a deliberate schedule to reduce the burden on the operator. Two improvement categories were proposed that, if implemented, would result in increased assurance that the level instrumentation will provide the inadequate core cooling instrumentation required by NUREG-0737, Item II.F.2. Licensees were asked to submit description of plans to implement these improvements and a proposed schedule.

By letter dated December 5, 1984, you responded to GL 84-23 and indicated that the wide range and fuel zone reactor vessel water level instrumentation would be modified to improve accuracy and reliability under transient and accident conditions and decrease the need for operator diagnosis. The specific modifications would address the issue of indication errors caused by high drywell temperature and are, therefore, acceptable. The proposed implementation dates for modification (Unit 2 - during the current outage and Unit 3 - during the 1987 pipe replacement outage) are acceptable.

Your letter also addressed the second improvement category: replacement of mechanical level indication equipment with analog level transmitters. Currently, all mechanical level indication equipment used for reactor water level measurement has been replaced with analog level transmitter and trip units with the exception of four instruments used for tripping the recirculation pumps in the event of an anticipated transient without scram. We find that the above action already taken at the Peach Bottom facility adequately addresses the second improvement category and, therefore, we find no further modifications are necessary at this time.

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Mr. Edward G. Bauer, Jr.

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Therefore, this completes our review of NUREG-0737, Item II.F.2 for the Peach Bottom facility.

Sincerely,

"ORIGINAL SIGNED BY
JOHN F. STOLZ"

John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

cc: See next page

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Philadelphia Electric Company

cc w/enclosure(s):

Eugene J. Bradley
Philadelphia Electric Company
Assistant General Counsel
2301 Market Street
Philadelphia, Pennsylvania 19101

Troy B. Conner, Jr.
1747 Pennsylvania Avenue, N.W.
Washington, D. C. 20006

Thomas A. Deming, Esq.
Assistant Attorney General
Department of Natural Resources
Annapolis, Maryland 21401

Philadelphia Electric Company
ATTN: Mr. R. Fleishmann
Peach Bottom Atomic
Power Station
Delta, Pennsylvania 17314

Albert R. Steel, Chairman
Board of Supervisors
Peach Bottom Township
R. D. #1
Delta, Pennsylvania 17314

Her5 J. Williams
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Peach Bottom Atomic Power Station
P. O. Box 399
Delta, Pennsylvania 17314

Mr. Thomas E. Murley, Regional Administrator
U. S. Nuclear Regulatory Commission, Region I
Office of Inspection and Enforcement
631 Park Avenue
King of Prussia, Pennsylvania 19406

Regional Radiation Representative
EPA Region III
Curtis Building (Sixth Floor)
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

M. J. Cooney, Superintendent
Generation Division - Nuclear
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Mr. R. A. Heiss, Coordinator
Pennsylvania State Clearinghouse
Governor's Office of State Planning
and Development
P. O. Box 1323
Harrisburg, Pennsylvania 17120

Thomas M. Gerusky, Director
Bureau of Radiation Protection
Pennsylvania Department of
Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120