

October 29, 1984

Dockets Nos. 50-277  
and 50-278

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*DCC 016*

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

Dear Mr. Bauer:

SUBJECT: PROPOSED INSERVICE INSPECTION (ISI) PROGRAM-  
REQUEST FOR ADDITIONAL INFORMATION

We have initiated the review of the proposed Peach Bottom inservice inspection (ISI) program for the second 10-year inspection interval dated June 28, 1984. We will be using the submittal, along with documents referenced in it, to review your requests for relief and code-allowed exemptions from the requirements of the 1980 edition (with addenda through Winter 1981) of Section XI of the ASME Boiler and Pressure Vessel Code. Based upon our initial review, we have determined that the attached request for additional information requires your timely response in order for our review to continue. We would appreciate your response to this request within 30 days of the receipt of this letter.

If you have any questions concerning this request, please contact your NRC Project Manager, (Gerald Gears at 301-492-8362).

The information requested in this letter affects fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

John F. Stolz, Chief  
Operating Reactors Branch No. 4  
Division of Licensing

Enclosure:  
As stated

cc w/enclosure:  
G. Johnson

ORB#4:1	METB	YB	ORB#4:BL
GGears:lf	GJohnson	JFStolz	
10/15/84	10/25/84	10/26/84	

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PDR ADOCK 05000277  
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REQUEST FOR ADDITIONAL INFORMATION  
INSERVICE INSPECTION PROGRAM

Peach Bottom Atomic Power Station, Units 2 and 3

1. By letter dated June 28, 1984<sup>(3)</sup>, you submitted a proposed inservice inspection (ISI) program for the second 10-year inspection interval of Peach Bottom, Units 2 and 3. We will be using this program, along with the documents referenced in it, to review your requests for relief and code-allowed exemptions from the requirements of the 1980 edition (with addenda through Winter 1981) of Section XI of the ASME Boiler and Pressure Vessel Code. If there are any documents not referenced that you believe may aid our review (including any additional relief requests) please provide us with copies. If they have been previously furnished to the NRC, please document by reference.
2. Referring back to the first 10-year inspection interval, if there are any instances where you have previously not requested relief in the submittals reviewed for the Safety Evaluation Report<sup>(2)</sup>, you must request such relief, under the terms of subparagraph 10 CFR 50.55a(g)(5)(iv), from the requirements of the Code edition applicable during the first interval. Please submit such requests, if any, at this time.
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 as follows:

- 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 system 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.

4. Subsection IWE of the Code

The above referenced edition of the Code contains a recently issued subsection (IWE) pertaining to containment related examinations. The Peach Bottom program plan, however, contains no provisions for examinations under subsection IWE. Please provide a program for examining the areas subject to this subsection.

5. 2.4.1 Request for Relief on Reactor Vessel Welds (p 2-10)

- (a) Please provide information on the accessibility of reactor vessel welds to examination from the vessel interior.
- (b) What percentage of each beltline longitudinal and circumferential weld is estimated to be accessible from the vessel exterior?

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.
- (b) The relief request states that removing the relief valves is impractical. We note, however, that the valves are bench-tested when lift tests are required. Please show why a code hydrostatic test cannot be performed when the lowest-set relief valves are removed for bench testing.

7. 4.4.1 Relief Request on Pressure Testing of Class 3 Systems (p 4-3)

According to the Code edition referenced above, Class 3 systems are to be hydrostatically tested to 110% of the setpoint of the lowest-set relief valve that protects the system or portion of the system. This pressure is considerably less than 110% of design pressure. Please submit a revised relief request based on the capabilities of the various pumps to produce the required pressures. Those sections of each system that actually need relief should be specified.

8. 5.3.1 Relief Request on ISI of Component Supports (p 5-1)

Apparently, the requested relief is intended to eliminate duplication of examination and reporting activities between Code requirements and your Technical Specifications. Please submit a revised relief request that shows how the component support program authorized in the Technical Specifications meets or exceeds the requirements of the Code. Alternatively, you may wish to propose a change in the



Technical Specifications eliminating the component support program. Such a request would be in line with NRC guidance<sup>(4)</sup>, which recommends changes in the Technical Specifications to eliminate conflicts with the Code.

#### References

1. Letter, T. A. Ippolito (NRC) to E. G. Bauer (PECo), August 10, 1978.
2. Letter, J. F. Stolz (NRC) to E. G. Bauer (PECo), May 2, 1983, transmitting Safety Evaluation Report.
3. Letter, S. L. Daltroff (PECo) to J. F. Stolz (NRC), June 28, 1984 - 2nd Interval ISI Program attached.
4. Letter, G. Lear (NRC) to E. G. Bauer (PECo), April 26, 1976.