

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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December 31, 1992

Docket Nos. 50-277

50-278

License Nos. DPR-44

DPR-56

NUCLEAR SERVICES DEPARTMENT

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Subject: Peach Bottom Atomic Power Station, Units 2 and 3  
NRC Generic Letter 88-20, Individual Plant Examinations (IPE)  
for Severe Accident Vulnerabilities  
Implementation of SE-11, Loss of Off-Site Power Procedure

Reference: Letter from G. J. Beck (PECo) to USNRC dated August 26, 1992

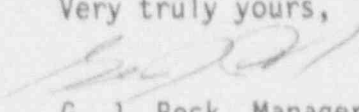
Dear Sir:

In the reference letter, PECO informed you that the Loss of Off-Site Power (LOOP) Procedure (SE-11) was scheduled for implementation by December 31, 1992. The Peach Bottom IPE Analysis provided an insight that by improving and prioritizing operator actions to optimize the diesel generator loading for LOOP scenarios, an overall safety enhancement could be made. During the analysis of the SE-11 procedure, a potential conflict with the Appendix R Safe Shutdown Analysis was identified. Additional analysis is required to assure appropriate resolution of the conflict. It is expected that this analysis and the implementation of SE-11 will be completed by April, 1993.

Delaying implementation of SE-11 does not impact the safe operation of the plant. This procedure provides a safety enhancement in response to LOOP events; however, the current design and procedures provide an adequate response to LOOP events. The SE-11 procedure implementation is part of our IPE and was considered in calculating the Core Damage Frequency (CDF) submitted in Reference 1. CDF calculations have been performed to assess the effects without the enhancements to SE-11. These calculations show that PBAPS as currently operating has a CDF consistent with other BWRs.

This delay in implementation was discussed with J. Shea, Action Project Manager, on December 29, 1992 and we regret any inconvenience this may cause you.

Very truly yours,

  
G. J. Beck, Manager  
Licensing Section

cc: T. T. Martin, Administrator, Region I, USNRC  
J. J. Lyash, USNRC Senior Resident Inspector, PBAPS  
W. P. Dornsife, Commonwealth of Pennsylvania

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