PHILADELPHIA ELECTRIC COMPANY

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October 17, 1985

Docket Nos. 50-277

50-278

SHIELDS L. DALTROFF VICE PRESIDENT ELECTRIC PRODUCTION

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

> SUBJECT: Compliance with the Anticipated Transients Without Scram (ATWS) Rule, 10 CFR 50.62 Peach Bottom Atomic Power Station, Units 2 & 3

REFERENCE:

- Final ATWS Rule, 10 CFR 50.62, published in the June 26, 1984, Federal Register
- (2) Generic Letter 85-06, " Quality Assurance Guidance for ATWS Equipment That is Not Safety-Related", dated 4/16/85
- (3) "Guidance Regarding System and Equipment Specifications", published in the June 26, 1984, Federal Register

Dear Mr. Denton:

This letter provides a schedule for compliance with 10 CFR 50.62, "Requirements for Reduction of Risk from Anticipated Transient Without Scram (ATWS) Events for Light-Water Cooled Nuclear Power Plants," at Peach Bottom Atomic Power Station, Units 2 and 3. In order to compensate for the late submittal of this response we are transmitting this material directly to your project manager by expedited mail.

Four of the six requirements of 10 CFR 50.62 are applicable to Peach Bottom Atomic Power Station, Units 2 and 3. Requirements (c)(1) and (c)(2) pertain to pressurized water reactors and, therefore, do not apply to Peach Bottom. Requirement (c)(5) has already been implemented at the Peach Bottom Atomic Power Station, Units 2 and 3. Requirements (c)(3) and (c)(4) require plant modifications.

In accordance with paragraph (c)(3), each boiling water reactor must have an alternate rod injection (ARI) system that is diverse (from the reactor trip system) from sensor output to the final actuation device. In accordance with paragraph (c)(4), each boiling water reactor must have a standby liquid control system (SLCS) with a minimum flow capacity and boron content

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equivalent in control capacity to 86 gallons per minute of 13 weight percent sodium pentaborate solution.

The construction of an ARI system and modifications to the SLCS are scheduled for completion during the next refueling outage on each unit. These outages are currently scheduled to begin November 15, 1986 for Unit 2, and March 14, 1987 for Unit 3. The design and construction of these systems to be installed at Peach Bottom will satisfy the requirements of 10 CFR 50.62(c)(3) and (4), and the guidance contained in references 2 and 3.

In accordance with paragraph (c)(5), each boiling water reactor must have equipment to trip the reactor coolant recirculating pumps automatically under conditions indicative of an ATWS. A reactor coolant recirculating pump trip under conditions indicative of an ATWS was implemented at Peach Bottom Atomic Power Station, Units 2 and 3, prior to commerical operation.

Paragraph (c)(6) requires that information sufficient to demonstrate to the Commission the adequacy of items in paragraphs (c)(1) through (c)(5) shall be submitted to the Director, Office of Nuclear Reactor Regulation. A detailed description of the proposed modifications to comply with Requirements (c)(3), ARI, and (c)(4), SLCS, will be submitted by June 30, 1986. The design of the recirculation pump trip, Requirement (c)(5), was described in detail in the letters from John L. Hankins (PECo) to Victor Stello, Jr. (NRC) dated 10/8/76, and from E. J. Bradley (PECo) to T. Ippolito (NRC) dated 7/14/78, attachments 1 and 2.

Should you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

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Attachments

cc: T. P. Johnson, Resident Site Inspector