Station Support Department
10 CFR 50.55a

PECO NUCLEAR
A Unit of PECO Energy

PECO Energy Company
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

May 6, 1997

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

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

Subject: Peach Bottom Atomic Power Station, Units 2 and 3
Submittal of Revised Relief Request (RR) 22 to the Second Ten Year Interval of the Inservice Inspection (ISI) Program

Dear Sir:

Attached for your review and approval is Relief Request (RR) 22 for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3 Second Ten Year Interval Inservice Inspection (ISI) Program. A discussion of the changes, and the basis for relief, is contained in the attached Relief Request. We request that this relief be approved by August 30, 1997 for use during the upcoming PBAPS, Unit 3 refueling outage (3R11) currently scheduled to begin in October, 1997.

If you have any questions, please contact us.

Very truly yours,

G. A. Hunger, Jr.

G. A. Hunger, Jr.
Director - Licensing

A047

Enclosure

cc: H. J. Miller, Administrator, Region I, USNRC
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS

140005

9705150011 970506
PDR ADOCK 05000277
Q PDR

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3
RELIEF REQUEST (RR) - 22

Code Requirement: Reactor Pressure Vessel (RPV) and Class 1 Hydrostatic Testing, Table IWB-2500-1, Item No. B15.11

Category: Examination Category B-P

Testing Requirement(s): The code requirement requires a hydrostatic test of the Reactor Pressure Vessel and Class 1 piping to be performed one time in the 10-year interval at or near the end of the interval.

Basis for Relief: Hydrostatic tests of the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3 Reactor Pressure Vessels and Class 1 piping were performed during the second period of the current second interval. These tests were performed as a result of modifications to the Class 1 piping and components at the conclusion of refueling outages 2R08 (March, 1991) and 3R08 (December, 1991). These tests were performed with acceptable results. The 1991 tests satisfy the code requirement of one test per interval. Performance of an additional test at or near the end of the interval, during 3R11 (1997) and 2R12 (1998), to meet the code requirement regarding the scheduling of this once per interval test would be redundant to the tests previously performed earlier in the interval. Performing the test is impractical, and creates an undue hardship without a compensating increase in safety. This undue hardship results from the financial burden incurred as a result of the increased outage length to perform the test. For the third interval, the test will be performed in the second period. This schedule is consistent with the Code requirements for Class 2 testing, which recognizes that the hydrostatic tests may be performed on a nominal 10-year frequency. This schedule is also consistent with ASME Code Section XI, Paragraph IWB-2420, which states that the sequence of component examinations established during the first inspection interval shall be repeated during each successive inspection interval to the extent practical. Therefore, this proposed alternative frequency will

provide an acceptable level of quality and safety. A system leakage pressure test in accordance with Table IWB-2500-1, Item No. B15.10, is performed in outages when the hydrostatic test is not performed.

Alternate Testing:

The 1991 tests satisfy the hydrostatic test requirement for the second interval. In the third interval, this test will be performed in the second period, which will ensure that the time between tests will not exceed three periods.