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JOSEPH W. GALLAGHER
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GL 87-02

USI A-46

October 6, 1988

Docket No. 50-277

50-278

Mr. Lawrence C. Shao, Director
Division of Engineering and Systems Technology
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

SUBJECT: Peach Bottom Atomic Power Station Response to Generic
SER on SQUG Resolution of Unresolved Safety Issue A-46

Dear Mr. Shao:

On July 29, 1988, the NRC Staff issued a Safety Evaluation Report (SER) on Revision 0 of the Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment developed by the Seismic Qualification Utility Group (SQUG). The letter to SQUG enclosing the SER requests that SQUG member utilities provide to the NRC, within 60 days, a schedule for implementing the GIP. By letter dated August 19, 1988 to you, SQUG clarified that the 60 days would expire on October 7, 1988. This letter responds to the NRC request for our plant-specific seismic verification plans for Peach Bottom, consistent with the requirements of Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issues (USI) A-46."

As a member of SQUG, Philadelphia Electric has supported the many efforts on which the GIP is based. The SER endorses the methodology and criteria embodied in Revision 0 of the GIP, subject to satisfactory resolution of a number of open issues and NRC comments. Action by SQUG and its contractors is underway to resolve the identified open issues and comments in accordance

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with the SQUG schedule presented at the August 10-11, 1988 meeting with the NRC staff and included with the SQUG letter to you dated August 19, 1988. This schedule projects completion of Revision 2 of the GIP in Spring, 1989, contingent upon SQUG and NRC agreement on the resolution of the various open issues. Revision 2 of the GIP is the version which is scheduled to contain all of the information needed to implement the USI A-46 generic letter at SQUG member plants. The final NRC SER Supplement on Revision 2 of the GIP is anticipated by mid-1989.

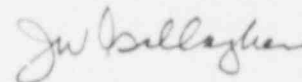
Philadelphia Electric Company's plans for implementation of the GIP at our Peach Bottom plant are preliminary given the current status of and schedule for completion of Revision 2 of the GIP and NRC's SER Supplement on that revision. However, it is our current plan to resolve USI A-46 for our Peach Bottom plant by implementation of the generic criteria and methodology included in Revision 0 of the GIP, as clarified by the SQUG responses to the NRC SER submitted to you by letter dated late September 22, 1988. The current workscope is described in Revision 0 of the GIP, with criteria to be added for cable raceways, tanks, heat exchangers, and relays. Assuming no major changes in the current workscope, we plan to perform the seismic verification plant walkdown required by the GIP by the conclusion of the first refueling outage after receipt of the final SER Supplement and resolution of all open issues. If the final NRC SER Supplement with no open items is issued by the second quarter of 1989, then the plant walkdown at Peach Bottom is expected to be completed on both units by about January, 1991. Identification of safe shutdown equipment, gathering of necessary plant-specific data, and training of our walkdown team members will be initiated prior to the walkdowns.

Our current implementation plan and schedule, as described above, are based on the "SQUG Commitments" identified in each section of the GIP. Our implementation and schedule commitment is contingent upon our current understanding of the GIP. If the scope of the final revision of the GIP, or the cost and effort required to implement it at our plant, change significantly from the current scope and cost estimates, we will need to reevaluate our commitments. We also desire to integrate the resolution of USI A-46 with the resolution of numerous other related seismic issues (e.g., Eastern Seismicity, Seismic Margins, and Severe Accident Individual Plant External Event Evaluations). In view of the uncertainties in the requirements and schedule for resolution of these related issues, we may need to revise the implementation schedule for USI A-46 at Peach Bottom to integrate these potential future requirements into a single, cost-effective program. This possibility has been the subject of on-going discussions between SQUG and your staff, and

further discussions are planned. We will advise you in writing of any changes in our implementation plans and schedules.

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

Very truly yours,



cc: Addressee

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