



PECO NUCLEAR

A UNIT OF PECO ENERGY

GL 96-01 (10 CFR 50.54 (f))
November 26, 1997

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

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,
Response to Generic Letter 96-01, "Testing of Safety-Related
Logic Circuits"

Reference: 1) Letter from G. A. Hunger Jr. (PECO Energy Company) to
USNRC dated April 18, 1996.

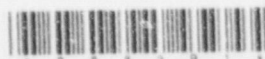
Dear NRC Officials:

Generic Letter (GL) 96-01, dated January 10, 1996, "Testing of Safety-Related Logic Circuits," requested Licensees to provide a written response within 60 days of the date of the GL indicating whether or not the licensee will implement the requested actions. Our response to this request was provided in a letter dated April 18, 1996. Additionally, the GL requested that within 30 days of completion of the requested actions, a response confirming completion of these actions be submitted to the U. S. Nuclear Regulatory Commission (USNRC). The following is our response confirming completion of these actions for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3.

COMMITMENT:

As stated in our Referenced letter, PECO Energy Company (PECO Energy) has defined the scope of GL 96-01 as Technical Specification-required Surveillance Procedures for systems that are required for either accident mitigation or whose failure will affect accident mitigation. Having defined the scope, PECO Energy committed to ensuring that these Surveillance Procedures adequately test safety-related automatic actuation logic circuitry so that a failure of an essential electric component (e.g., relay, contact) will not be undetected for an extended period of time. Generally, these surveillance requirements are completed by Logic System Functional Tests (LSFT); however, PECO Energy would include other tests, such as channel functional tests, that are intended to verify operability of equipment within the scope of GL 96-01.

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As discussed in the action plan contained in the April 18, 1996 letter, a thorough review of the licensing basis of PBAPS would be completed to identify those systems, structures, and components that satisfy the scope of GL 96-01. For PBAPS, in response to Information Notice (IN) 88-83, a systematic review of LSFT required by the Technical Specifications (TS) then in effect, was performed. In the early 1990's, PBAPS completed a program to review and re-write all Surveillance Tests (STs) required by those TS. During these reviews, special emphasis was placed on LSFT, with the intent that the new STs adequately test all of the electrical devices within a logic system. Based on these reviews, we believe PBAPS had satisfied the requested actions for the majority of the systems within the scope of GL 96-01; however, these reviews were based on the custom TS that PBAPS has since replaced with Improved Technical Specifications (ITS). To verify that these reviews were maintained through procedure revisions and that logic testing for systems included in ITS is adequate, a review of at least one logic division of each of the systems within the scope of GL 96-01 would be completed. Where there are differences between the logic divisions in a system, a review would be completed to ensure that these differences are adequately tested.

RESPONSE:

Our review of the licensing basis of PBAPS determined that the following systems are within the scope of GL 96-01:

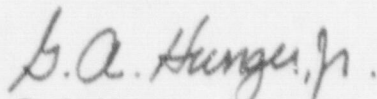
1. Automatic Depressurization System (ADS)
2. Core Spray (CS) System
3. Reactor Protection System (RPS)/Scram Discharge Volume (SDV)
4. High Pressure Coolant Injection (HPCI) System
5. Reactor Core Isolation Cooling (RCIC) System
6. Primary Containment Isolation System (PCIS)
7. Residual Heat Removal (RHR) System
8. Emergency Service Water (ESW) System
9. Main Control Room Emergency Ventilation System (MCREV)
10. Secondary Containment Isolation System (SCIS)/ Standby Gas Treatment System (SBGT)
11. Emergency Diesel Generator (EDG)/4 kV

A review of the PBAPS, Unit 2 systems has been completed to satisfy the requested actions of this GL. The PBAPS, Unit 2 and PBAPS, Unit 3 systems are tested and designed in a similar manner. For PBAPS, Unit 2, all divisions of the ADS, HPCI, RCIC, ESW, and PCIS were reviewed. One division of the CS, RPS/SDV, RHR, MCREV, SCIS/SBGT, and EDG/4 kV were reviewed. This

review identified a testing deficiency in the Common SBT system and one in each unit's RHR system. The untested SBT system contacts were associated with initiation of the heaters for each train of the SBT system. The RHR system testing deficiency was associated with an insufficient method of verifying contact state associated with the reactor low pressure relays. This RHR condition was common to each train of RHR for Unit 2 and Unit 3. Corrective actions to compensate for the untested logic were taken in accordance with Technical Specification Surveillance Requirement SR 3.0.3. All of the deficient contacts were tested and operated correctly. The inadequately tested contacts were the subject of Licensee Event Report 2-97-008 for PBAPS, Units 2 and 3.

If you have any questions, please contact us.

Very truly yours,



C. A. Hunger, Jr.,
Director - Licensing

Affidavit

cc: H. J. Miller, Administrator, Region I, USNRC
R. S. Barkley, USNRC Senior Resident Inspector, PBAPS


COMMONWEALTH OF PENNSYLVANIA:

: SS.

COUNTY OF CHESTER :

D. B. Feters, being first duly sworn, deposes and says:

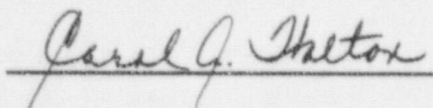
That he is Vice President of PECO Energy Company; that he has read the enclosed response to Generic Letter 96-01 for Peach Bottom Atomic Power Station Operating Licenses DPR-44 and DPR-56, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.


Vice President

Subscribed and sworn to

before me this 26th day

of November 1997.



Notary Public

