

# PHILADELPHIA ELECTRIC COMPANY

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November 3, 1986

Dr. Thomas E. Murley  
Regional Administrator, Region I  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19046

Docket Nos. 50-277  
50-278

Subject: Peach Bottom Atomic Power Station Units 2 & 3  
I.E. Bulletin 85-03, "Motor-Operated Valve Common  
Mode Failure During Plant Transients Due to Improper  
Switch Settings"

Reference: Letter, J. S. Kemper (PECo) to T. E. Murley (NRC),  
dated October 2, 1986 (Revised Copy Attached)

Dear Mr. Murley:

By this letter, Philadelphia Electric Company (PECo) submits a revised response to I.E. Bulletin 85-03 which corrects our previous submittal for the Peach Bottom Atomic Power Station.

In our response to Item (a) of the Bulletin, it was incorrectly stated that all differential pressures developed in accordance with the BWROG methodology were found to be less than the originally specified values. This statement is correct except for the HFCI and RCIC torus suction valves (MO-23-57 & 58 and MO-13-39 & 41). For these valves, the originally specified differential pressure is 65 psid whereas the maximum differential pressure calculated using the BWROG methodology is 93 psid (in the open direction only).

This condition does not affect the adequacy of the valves in question. As part of our IEB 85-03 program, we have confirmed with valve and motor-operator vendors that the valve assemblies have the design capability to operate under the higher differential pressure conditions.

In addition to the above, we have provided the following minor revisions:

- 1) Supplemental information has been added regarding torque-switch bypassing during valve travel in the open direction which is a current PBAPS design feature.

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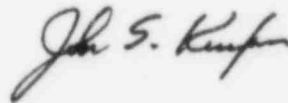
- 2) The table has been revised to reflect the correct normal position of valve M0-13-20.
- 3) Typographical errors have been corrected.

In summary, PECO still adopts the BWROG-based maximum operating differential pressures as previously submitted for the purposes of the IEB 85-03 program (i.e., verification testing of the MOVs will be based on the BWROG developed values).

Please disregard the referenced submittal and consider the attached version as the Philadelphia Electric Company response to I.E. Bulletin 85-03 for the Peach Bottom Atomic Power Station Units 2 & 3.

PECO apologizes for any inconvenience that these changes may cause your office in processing our submittal.

Sincerely,



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Copy to: T. P. Johnson, Resident Site Inspector  
USNRC, Document Control Desk