

March 21, 2000

Mr. James A. Hutton  
Director-Licensing, MC 62A-1  
PECO Energy Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
P.O. Box No. 195  
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SUBJECT: CLARIFICATION TO SAFETY EVALUATION CONCERNING ALTERNATIVES TO THE REQUIREMENTS OF 10 CFR 50.55a(g)(6)(ii)(B)(1) REGARDING THE CONTAINMENT INSERVICE INSPECTION PROGRAM FOR PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 (TAC NOS. MA8160 AND MA8161)

Dear Mr. Hutton:

By letter dated September 17, 1999, the Nuclear Regulatory Commission (NRC) issued a safety evaluation (SE) approving 11 alternatives to the requirements of 10 CFR 50.55a(g)(6)(ii)(B)(1) concerning the implementation of a Containment Inservice Inspection Program. Section 2.11.5 (page 24) of the above cited NRC SE states, "Also, in conjunction with the underwater examinations, ultrasonic thickness measurements will be, periodically, taken on the defined evaluation areas from the outside of the suppression chamber and from the inside of the suppression chamber at the pitted areas."

By letter dated February 7, 2000, PECO Energy Company correctly pointed out that ultrasonic thickness measurements are not required from the inside of the suppression chamber. Actual pit depth measurements are taken from the inside of the suppression chamber with a calibrated measurement tool and not ultrasonic thickness measurements implied in Section 2.11.5 of the above cited SE. A corrected page 24 of the staff's SE is enclosed.

We regret any inconvenience this may have caused. If you have any questions regarding this matter, please call me at 301-415-1483.

Sincerely,

*/RA/*

James W. Clifford, Chief, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-277 and 50-278

Enclosure: Corrected Safety Evaluation page 24

cc w/encl: See next page

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Units 2 and 3

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surfaces (including degraded coating, corrosion pits, etc.) will be evaluated. Also, in conjunction with the underwater examinations, ultrasonic thickness measurements will be, periodically, taken on the defined evaluation areas from the outside of the suppression chamber and pit depth measurements will be taken from the inside of the suppression chamber using a calibrated pit depth measurement tool. In addition, a VT-3 examination shall be performed on the exterior surface of the suppression chamber below the horizontal centerline (elev. 110 ft.) in accordance with Table IWE-2500-1, examination category E-A. The final results will be evaluated and documented.

On the basis discussed above, the staff finds that the implementation requirements of this program provide a reasonable method to examine containment surfaces requiring augmented examination. Therefore, the staff concludes that the alternative proposed by the licensee provides an acceptable level of quality and safety, and is authorized pursuant to 10 CFR 50.55a(a)(3)(i).

### 3.0 CONCLUSION

The staff concludes that for Proposed Alternatives CRR-03, 05, 08, 09, 10, and 11, the licensee's proposed alternatives will provide an acceptable level of quality and safety. Therefore, the proposed alternatives are authorized pursuant to 10 CFR 50.55a(a)(3)(i). For Proposed Alternatives CRR-01, 02, 04, 06, and 07, the staff concludes that compliance with the ASME Code requirements would result in hardship without a compensating increase in the level of quality and safety, and that PECO Energy's proposed alternatives will provide reasonable assurance of containment pressure integrity. Therefore, these proposed alternatives are authorized pursuant to 10 CFR 50.55a(a)(3)(ii).

Principal Contributor: T. Cheng

Date: September 17, 1999