

BOSTON EDISON COMPANY  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

ANDREW F. CORRY  
SENIOR VICE PRESIDENT

October 25, 1979

Director of Nuclear Reactor Regulation  
Attention: Mr. O. D. Parr, Chief  
Branch No. 3  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

PSAR Amendment No. 39 to  
License Application Filed  
12/21/73 (Docket No. 50-471)

References:

- (a) NRC letter dated 10/10/79 from D. B. Vassallo to all Pending Construction Permit Applicants
- (b) Boston Edison letter dated 8/24/79 from J. Edward Howard to O. D. Parr, USNRC
- (c) Boston Edison letter dated 8/6/79 from Andrew F. Corry to O. D. Parr, USNRC
- (d) Boston Edison letter dated 7/31/79 from Andrew F. Corry to O. D. Parr, USNRC

Dear Mr. Parr:

Pursuant to the Atomic Energy Act of 1954, as amended, and the Commission's Rules and Regulations issued thereunder, Boston Edison Company hereby supplements and amends the License Application filed December 21, 1973, by supplying the attached PSAR amendment No. 39.

This Amendment incorporates into the PSAR the commitments related to the Three Mile Island incident.

In Reference (a) the NRC requested that Construction Permit Applicants take the following actions regarding lessons learned from the Three Mile Island incident:

- 1) Commit to implement the actions in NUREG-0578, as modified by Reference (a), and
- 2) Submit an amended application to reflect these commitments.

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Mr. Olan D. Parr  
October 25, 1979  
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Boston Edison has reviewed Reference (a) and compared it with our previously filed correspondence related to Three Mile Island commitments, namely References (b), (c) and (d). We conclude that our previous correspondence has addressed all of the commitments that you request in Reference (a). Reference (a) includes certain clarifications, corrections, and minor changes in NRC position statements. In each of these cases, our previous commitment still applies.

Attachment 1 to this letter is Amendment #39 to the Pilgrim 2 PSAR, which incorporates the TMI-related commitments for Pilgrim 2. For your convenience in review, Attachment (2) is a cross-index between the commitments in the PSAR amendment and the previous correspondence. Please note that Amendment #39 includes the commitments required by Reference (a) and also those required by the NRR Bulletin and Orders Task Group.

This transmittal consists of three (3) signed originals and 60 copies each of Attachment (1) (PSAR Amendment 39) and of Attachment (2).

Very truly yours,

*James M. Lydon*

Commonwealth of Massachusetts)  
County of Suffolk )

Then personally appeared before me J. M. Lydon, who being duly sworn, did state that he is a Senior Vice President of Boston Edison Company, an Applicant herein, that he is duly authorized to execute and file the within Amendment in the name and on behalf of Boston Edison Company and the other Applicants herein and that the statements in said letter are true to the best of his knowledge and belief.

*Kathryn B. Muldoon*  
Notary Public

My Commission Expires: *Feb 2, 1984*

Attachments:

- 1) PSAR Amendment #39 dated  
October 22, 1979
- 2) Cross-Index of TMI Commitments

cc: Distribution List Attached

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## Attachment 2

### Cross-Index of TMI Commitments

The following tabulation relates the NRC letter of October 10, 1979, to the text of PSAR Amendment #39 and to previous Boston Edison correspondence. All technical elements of PSAR Amendment #39 have been addressed by previous Boston Edison commitments. Text errors have been corrected as noted in the table.

<u>Commitment Element from Letter of October 10</u>	<u>Location in PSAR Amendment 39</u>	<u>Previous Boston Edison Correspondence</u>
NUREG-0578 (Appendix A)	1C.1 through 1C.23	Letters of 8/6/79 & 8/24/79 (References c & b) See Note 1
Pg 2, Para (c), and Encl. (2); Shift Technical Advisor	1C.18	Letter of 8/24/79 (Reference b) See Note 2
Pg 2, Para (d) and Encl (3); Additional Instrumen- tation	1C.24	Letter of 8/24/79 (Reference b)
Pg 3, para (e) and Encl (4); High Point Gas Vent	1C.25	Letter of 8/24/79 (Reference b)
Pg 3, para (f) and Encl (5); Errata	1C.1 through 1C.23	Letter of 8/24/79 (Reference b) See Note 3
Pg 3 and Encl. 7; Emergency Preparedness	1C.26	Letters of 7/31/79 & 8/6/79 (References c & d) See Note 4
IE Bulletin 79-06B	1C.27	Letters of 7/31/79 & 8/6/79 (Reference d & c) See Note 5
In-Core Thermocouples	1C.28	Letter of 8/6/79 (Reference c) See Note 5

#### Footnotes to Table:

1. The text of PSAR Amendment 39 includes correction of a typographical error in line 8 of Boston Edison's response to Item 1C.16. Also, note that Boston Edison's response to NUREG-0578 in Encl. (1) of Ref. (d) was superseded by Ref. (b).
2. Boston Edison's position on the Shift Technical Advisor remains the same in PSAR Amendment 39 as it was in Reference (b).
3. These errata were previously provided to Boston Edison and the responses in Ref. (b) reflected them. Corrected text has been used in the NRC "position" portions of Appendix 1C, where applicable.
4. The Boston Edison responses have been editorially clarified to refer to various paragraphs of Appendix 1C instead of sections of NUREG-0578 or to Boston Edison correspondence.
5. Not directly referred to in letter of October 10, but included in PSAR Amendment 39.

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