

The

**BOSTON EDISON COMPANY**  
GENERAL OFFICES 800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

G. CARL ANDOSINI  
SUPERINTENDENT  
NUCLEAR OPERATIONS DEPARTMENT

October 15, 1979

BECO. Ltr. #79-189

Mr. Boyce H. Grier, Director  
Office of Inspection and Enforcement  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA. 19406

License No. DPR-35  
Docket No. 50-293

Subject: IE Bulletin 79-02

Reference (a): Supplement No. 1 to IE  
Bulletin 79-02, Revision  
No. 1, dated August 20, 1979

Dear Sir:

Boston Edison has reviewed Reference (a) and would like to offer the following comment with respect to the anchor bolt factor of safety. It is our opinion that an interim threshold factor of safety for continued operation of 2.0 is overly conservative for the following reasons:

- a) the governing loading condition, which includes the Design Basis Earthquake, is an extremely low-probability event for the life of the plant and, even more so, for the short period of time until appropriate modifications are made;
- b) there is an inherent conservatism in every aspect of the design of a nuclear power plant such as Pilgrim 1 the effects of which are compounded and reflected in the final design;
- c) in the case of Pilgrim 1, which is scheduled for a refueling outage in January 1980, the probability of experiencing even an OBE (let alone the DBE) between now and the start of the outage is almost non-existent.

For the above reasons Boston Edison plans to proceed as follows:

- as an interim measure only, a factor of safety for the concrete expansion anchor bolts of 1.25 will be used to determine system operability.

1311 176

7911120

037

Mr. Boyce H. Grier  
October 15, 1979  
Page 2

- a minimum factor of safety of 2.0 for the anchor bolts will be used for normal operating loading conditions to determine system operability.
- as stated in Reference (a) all affected systems will be upgraded to the required factors of safety of 4 or 5 expeditiously for normally accessible supports and by the end of the next refueling outage for nonaccessible supports.

It is Boston Edison's firm belief that the health and safety of the public will not be significantly increased by following the approach outlined above. If you have any questions please do not hesitate to call us.

Very truly yours,

*G. Carl Andolini*

cc: United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Division of Reactor Operation Inspection  
Washington, D. C. 20555

1311 177