

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

A. V. MORISI  
MANAGER  
NUCLEAR OPERATIONS SUPPORT DEPARTMENT



August 14, 1981

BECO. Ltr. #81-190

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Regulatory Commission  
Washington, D.C. 20555

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

ORDER CONFIRMING LICENSEE COMMITMENTS  
ON POST TMI RELATED ISSUES

Dear Sir :

Boston Edison has reviewed your letter dated July 10, 1981 confirming our commitments for TMI related activities for Pilgrim Nuclear Power Station, Unit 1. The order does not address our specific commitments as referenced in the attachment to the order. It is Boston Edison's understanding, based on telephone conversations with your staff on August 7, 1981, that the Commission's intent is to confirm our specific commitments as stated in reference A, B, C, D, E, F, G and H. Based on that conclusion Boston Edison will not request a hearing for stay of the order dated July 10, 1981.

In an effort to address specific requirements and to provide clarification of our commitments, we are providing the following information regarding Post TMI related commitments in Attachment (1).

Additionally, we are reviewing the implementation of our commitments and will notify you of any deviations.

Very truly yours,

*A. V. Morisi*

Attachments

AVM/mce

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3  
1/1

References

(A)	BEC	Ltr	81-92	dated	May 8, 1981
(B)	BEC	Ltr	81-44	dated	Feb 27, 1981
(C)	BEC	Ltr	81-37	dated	Feb 11, 1981
(D)	BEC	Ltr	81-10	dated	Jan 22, 1981
(E)	BEC	Ltr	81-01	dated	Jan 5, 1981
(F)	BEC	Ltr	80-310	dated	Dec 15, 1980
(G)	BEC	Ltr	80-246	dated	Oct 1, 1980
(H)	BEC	Ltr	80-54	dated	April 4, 1980

ATTACHMENT 1

I.A.1.1 Shift Technical Advisor

As stated in reference (F) and (H) we created the position of STA. In reference (E) we described our training program for STA, in that response we stated our initial candidates will have completed training in section A and B by January 1, 1981 and section C and D of the program is scheduled to be complete by June 1, 1981 with requalification training in place by Jan 1, 1982. Our long term program was also described in that letter which is consistent with those in the INPO document entitled "Nuclear Power Plant Shift Technical Advisor".

#### I.A.2.1 Reactor Operator Qualification

As stated in reference (F) we had completed the following:

1. Revise training manual to required SRO applicants to have been an RO for 1 year by 12/1/80
2. SRO applicants to have experience commensurate with recommendations of I.A.2.1 and incorporate that criteria in our training manual by 5/1/80
3. SRO and RO applicants to have 3 months On the Job Training as an extra person on shift and incorporation of this requirement in our training manual by 8/1/80
4. Modify training and submit a revised program to OLB by 8/1/80 and to address mitigating core damage training in response to the requirements in TAP II.B.4
5. Certification of competence and fitness of applicants for SRO and RO license incorporated into training manual by 5/1/80.

## II.B.2 Plant Shielding

As stated in references (E) and (F) we committed to the following:

1. A review of our initial shielding study based on the clarification of NUREG 0737 item II.B.2.
2. A scheduled completion by 1/1/82 of the following modifications to provide vital area accessability:
  - a. Remote closure capability of the Reactor Building Truck Lock Door;
  - b. Post Accident Sample Sink installation;
  - c. Remote operation of Post Accident Combustible Gas Control Valves.
3. Not to consider a LOCA event in which the primary system does not depressurize in considering dose rates. This is based on the conclusion that emergency procedures in effect require the RCS be promptly depressurized and cooled down with low pressure systems following an accident of large scale fuel damage.

### II.B.3 Post Accident Sampling

As stated in reference (B, (E) and (H) we committed to the following:

1. Provide interim procedures for taking and handling a containment atmospheric sample by Nov 28, 1980.
2. Provide a new sample station outside the reactor building with new sample points for reactor coolant. Provision to maintain exposure to 3 rem whole body and 18 3/4 rem for extremities to the operator. Protection to the general public against the possibility of gas samples escaping from the new sample location.

Liquid Samples will be analyzed for dissolved hydrogen and isotopic content. Gas samples will be analyzed for hydrogen, oxygen and isotopic content.

3. Provide safety grade components up to and including the second automatically operated isolation valve in each sample line. Redundant sample lines up to the second isolation valve in each sample line. Non safety grade components and materials for the balance of the system.

The scheduled completion as stated in reference (B) is Jan. 14, 1982

#### II.B.4 Training for Mitigating Core Damage

As stated in references (E) and (F) we committed to the following:

Training for use of installed equipment and systems to control or mitigate accidents in which the core is severely damaged has been developed. The program is intended for training STA's and operating personnel from the plant manager through the operating chain to the licensed operators and includes all training indicated in enclosure 3 to H. R. Denton's March 38, 1980 letter. The training is scheduled tentatively for February through April 1981.



### I.C.1 Accident Procedures

As stated in reference (F) we committed to the following:

1. Revised and train operators in procedures applicable to SB LOCA by 6/1/80.

NOTE: Subsequent I&E site inspection based on our response in reference (H) and review of our procedures and training have concluded that this item is complete.

2. Reanalyze and propose guidelines regarding Emergency procedures for Inadequate Core Cooling by 1/1/81. Revise operators training and procedures after NRC guidance is issued.
3. Reanalyze and propose guidelines regarding Emergency procedures for Accidents and Transients by 1/1/81. Revise operators training and procedures after NRC guidance is issued.

### I.C.5 Feedback of Operating Experience

As stated in references (E) and (F) we committed to the following:

1. Procedures governing feedback of operating experience will be in effect by January 31, 1981.

I.C.6 Correct Performance of Operating Activities

As stated in references (B) and (F) we committed to the following:

A station policy regarding the subject matter will be in place by March 31, 1981 and procedures affected by that policy will be revised by June 1, 1981.

#### II.D.1 SRV Testing

As stated in reference (F) we committed to the following:

1. A testing program for RV/SV's as outlined by the BWR Owner's Group committee on RV/SV testing and a schedule consistent with NRC requirements.
2. Completion of test program and a review that valves meet operability concerns by 7/1/81.
3. Plant specific report by 10/1/81.

#### II.E.4.2 Containment Isolation

As we stated in references (D), (E) and (F) we committed to the following:

1. Provide documentation to positions 1-4 for II.E.4.2
2. Provide a response demonstrating the adequacy of our containment isolation setpoint. (Position 5)
3. Implement Administrative controls to satisfy position (6).

### II.F.1 Post Accident Monitoring

As we stated in our reference (B) and (F) we committed to the following:

1. Noble Gas Monitors have been installed per category A modifications. Procedures have been changed to convert mr/hr to uCi/sec. Detailed justification to show conformance with NUREG 0737 has been provided.
2. Particulate/Iodine monitoring capability is installed at PNPS-1. In the event the sample device is unavailable calculations have been performed and procedures are in place to determine conservative release rate estimates.

### II.F.2 Instrumentation for Inadequate Core Cooling

As we stated in our references (E) and (F) are committed to the following:

We participated in and endorsed the BWR Owner's Group position that current instrumentation is capable of detecting inadequate core cooling and no modifications are necessary at this time, but are evaluating our position and if any change is made we will notify NRC at that time.

#### II.K.3.3 SV/RV Challenges

As we stated in our references (B) and (F) we committed to the following:

Provide a report detailing SV/RV challenges since April of 1980.



II.K.3.13 Separation of HPCI/RCIC Initiation  
Levels and Auto Restart of RCIC

As we stated in our references (C), (E) and (F) we committed to the following:

1. Provide results of study to determine the feasibility and enhancement of separation of HPCI/RCIC initiation levels. Based on that report it was concluded that no modification is necessary.
2. Provide results of a study to determine the feasibility and enhancement of Auto Restart capability to the RCIC system. Based on that report, we committed to implement option 1 by January 1, 1982 and option 2 by July 1, 1982.

II.K.3.16 Reduction of Challenges and  
Failures to Relief Valves

As we stated in our reference (A) and (F) we committed to the following:

We participated in and endorsed the BWR Owner's Group position that would reduce the incidence of SORV. Additionally, we stated we have modified our RV and have procedures in effect that meet the requirements to reduce the incidence of SORV and challenges to relief valves.

#### II.K.3.17 ECCS Outage Reporting

As we stated in our reference (D) and (F) we committed to the following:

Provide a report detailing ECC system outages from January 1975 to December 1979. This item was completed and sent on January 22, 1981.

#### II.K.3.18 ADS Logic Modification

As we stated in our references (A) and (F) we committed to the following:

We participated in and endorsed the BWR Owners Group position that identified three options to ADS modifications including retention of existing logic coupled with implementation of the symptom oriented emergency procedures.

II.K.3.21 CSS/LPCI Restart

As we stated in our references (E) and (F) we committed to the following:

We participated in and endorsed the BWR Owners Group position that no enhancement to safety would be achieved and thus, no modifications are necessary.

II.K.3.22 RCIC Suction

As we stated in our references (B), (D) and (F) we committed to the following:

We have reviewed and revised our procedures and have concluded that existing procedures are adequate.

#### II.K.3.27 Common Water Level Reference

As we stated in our references (B), (D) and (F) we committed to the following:

Marker plates will be installed on all necessary level instruments referencing the top of active fuel.

#### II.K.3.30 SB LOCA Methods

As we stated in our references (F) and (G) we committed to the following:

General Electric will provide the NRC with a generic position and BECo will determine it's applicability to PNPS-1.



II.K.3.44 Evaluation of Transients with Single  
Failure to Verify No Fuel Failure

As we stated in our references (E) and (F) we committed to the following:

We participated in and endorsed the BWR Owners Group position and reviewed its applicability to PNFS-1. No further action is planned.

II.K.3.45 Evaluation of Depressurization other Than ADS

As we stated in our references (E) and (F) we committed to the following:

We participated in and endorsed the BWR Owners Group position and reviewed its applicability to PNPS-1.

### III.D.3.3 Improved Inplant Iodine Monitoring

As we stated in our reference (H) we committed to the following:

The intent of this position has been met by successfully completing the following:

1. Silver Zeolite cartridges have been purchased & stored onsite.
2. Cartridge equipment is procured and installed.
3. Standards for calibration have been prepared.
4. Procedures have been modified and training complete.

#### III.D.3.4 Control Room Habitability

As we stated in our reference (C) and (E) we committed to the following:

Provide details of the Control Room Habitability Study by Jan. 21, 1981.