

BOSTON EDISON COMPANY
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

July 5, 1983

BECO Letter No. 83-169

Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Proposed Amendment to Facility Operating License;
Long Term Program

Reference: BECo Letter No. 83-91, W.D. Harrington to D.G. Eisenhower, dated April 14, 1983.

Dear Sir:

Pursuant to Section 50.90 of the Commission's Rules and Regulations, Boston Edison Company (BECO) hereby proposes the following Amendment to Facility Operating License No. DPR-35.

Proposed Change

The change involves an addition of a new paragraph 3.H to page 4 of the Facility Operating License. This revision incorporates a license condition requiring BECO to follow its plan for implementing the Long Term Program for Pilgrim Nuclear Power Station and the terms therein for modifying the schedules. Our plan is enclosed as an attachment to this letter.

Reason for the Change

On April 14, 1983, Boston Edison Company (BECO) met with members of your staff to present its Long Term Program and schedule for Pilgrim Nuclear Power Station (PNPS) which was subsequently transmitted to you for your review and approval in the referenced letter. During the April 14 meeting we presented a historical perspective of experience at PNPS which led BECO to develop the program. We outlined the program objectives and the key steps taken to achieve these objectives. In addition we discussed in detail the specific elements addressed during the program development and explained the processes necessary for the continued operation and maintenance of the program.

We believe that the program will enhance the safe, reliable and economic operation of PNPS by achieving an effective balance between implementing those improvements required by the Regulators and those identified by our management. The program

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will enable BECo to prioritize without undue rigidity by scheduling future improvements in a realistic manner relative to the existing baseload and thereby allow BECo to better control and manage the deployment of its resources.

We believe that the proposed license condition will provide the degree of flexibility necessary to assure effective program implementation while assuring NRC identified issues are adequately addressed and resolved.

Safety Considerations

We have determined that the proposed amendment has no safety or environmental significance. We have concluded that operation of the facility in accordance with the proposed amendment would not: involve a significant increase in the probability or consequences of an accident previously evaluated, or create the possibility of an accident of a type different from any previously evaluated, or involve a significant reduction in a margin of safety. Based upon the above, the proposed amendment does not involve a significant hazard consideration.

The proposed amendment has been reviewed by the Nuclear Safety Review and Audit Committee and has been reviewed and approved by the Operations Review Committee.

Fee Consideration

Boston Edison Company proposes this change as a Class III Amendment, a check for \$4,000 shall be forwarded to you under a separate cover letter in the near future.

Should you have any questions or concerns regarding this matter, please do not hesitate to contact us.

Very truly yours,

W.D. Harrington

JMF/mat

Attachments

3 signed originals and 37 copies

Commonwealth of Massachusetts)
County of Suffolk)

Then personally appeared before me W.D. Harrington, who, being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company, the applicant herein, and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My Commission expires: *October 21, 1988*

Peter M. Kahler
Notary Public

3.H.1. The "Plan for the Long Term Program for Pilgrim Nuclear Power Station" submitted on April 14, 1983 (as revised).

- a) The Plan shall be followed by the licensee from and after the effective date of this amendment.
- b) The licensee is required to maintain current revisions of, and provide reports regarding, schedules associated with the Plan in accordance with the terms of the Plan and failure to do so shall constitute a violation of this license condition.
- c) Changes to dates for completion of items identified in Schedule B do not require a license amendment. Dates specified in Schedule A shall be changed only in accordance with applicable NRC procedures. Failure to complete items listed in the schedules in accordance with dates there specified shall not constitute a violation of this license condition but may constitute a violation of any regulations, orders or license condition imposing such date.

2. This license amendment shall be effective until _____ subject to renewal upon application by the licensee.

Plan for the Long Term Program - Pilgrim Nuclear Power Station

I. Introduction

Boston Edison Company (BECo) has developed a comprehensive program which will enable the Company to effectively manage implementation of certain modifications which have been required, or proposed by, the NRC, as well as other measures to enhance plant safety and reliability which have been identified by the Company. A description of the program, identified as "Long Term Program - Pilgrim Nuclear Power Station (PNPS)," was submitted to the NRC on April 14, 1983 by BECo Letter No. 83-91.

This program was developed to coordinate and schedule major necessary work at PNPS, whether mandated by NRC or identified by BECo and others. The program objectives are to (1) conform to regulatory requirements; (2) provide sufficient lead times for modifications; (3) minimize changes for operators; (4) assure training requirements are fulfilled; (5) effectively manage financial and human resources; and (6) specify the framework for changes to developed schedules.

This Long Term Program (the Program) reflects that fiscal and manpower resources are finite and that a limit on the onsite manpower is necessary. The Program integrates all presently planned work at PNPS over a nominal three year period to ensure that individual tasks are effectively scheduled and coordinated. It provides a means for new requirements to be accommodated taking into account schedule and resource constraints.

The purpose of this document is to describe the plan used to implement the Program. It describes how the Program functions, mechanisms for changing and updating it, and the interactions of NRC and licensee staffs under the Program, and its associated schedules.

II. Summary of Long Term Program Development

The Program is based on a computer generated listing of over 500 items of prioritized work. The listing takes into account projections for budgets and site manpower and engineering support requirements for three years, on an item-by-item basis covering major plant modification activities. It represents the PNPS work list and commitment list which is regularly modified and updated to meet changing conditions, including new NRC regulatory requirements. The final product of this Program is the development of schedules as discussed below.

III. Scheduling

Upon completion of the complete work listing, Boston Edison determined that detailed and integrated schedules were required for the major work items. Upon completing the comprehensive listing of major work items, the tasks were organized into Schedules A and B using critical path methodology (CPM) for selected work items. CPM schedules identify critical paths in the work

effort for each task, which in turn, enables prompt adaptation of schedules to meet contingencies such as strikes, delays in procurement or installation or modification of fuel cycle schedules. Both schedules are briefly described below:

- Schedule A - All items which have implementation dates mandated by NRC rules, orders, or license conditions.
- Schedule B - Regulatory items (of either a generic or plant specific nature) identified by NRC which have implementation dates committed to by Boston Edison and which would result in either a) plant modifications, b) procedure revisions, or c) changes in facility staffing requirements; or items perceived by Boston Edison as prospective NRC requirements; or major PNPS tasks resulting from mandates of agencies other than NRC and BECo-initiated system upgrades for availability improvement.

Schedule A dates may be modified only with the prior approval of NRC, in accordance with existing NRC procedures. Changes in Schedule B dates require written notification to NRC as described in Section V. Schedules A and B, taken together, provide a basis for assessing the overall effects of changes to schedules and a departure point for discussion between NRC and the licensee regarding such changes, as discussed below.

IV. Schedule Modifications

An important aspect of Boston Edison's planning effort is the recognition that the attached schedules will need to be modified at times to reflect changes in regulatory requirements, to accommodate those activities that Boston Edison finds necessary to improve plant efficiency and reliability, and to take into account delays resulting from events beyond BECo's control. It is important that the procedure used by Boston Edison for changing the schedules be documented.*/ In addition, the NRC must play a role in the oversight of the scheduling process (and must, in fact, judge the acceptability of proposed date changes in Schedule A). Accordingly, it is important that the NRC's role, and the interaction between the NRC and BECo be clearly defined, as discussed below.

V. Boston Edison Company Responsibilities

The integrated schedule requires that BECo monitor the progress of the work undertaken, manage its activities to maintain the schedule, and act promptly to take necessary actions when a schedule change is needed.

*/ Schedules A and B will contain sufficient detail to identify those items with completion dates keyed to fuel cycle outages. In such cases, a change in outage period shall not be considered a schedule change.

A. Periodic Updating

BECO will update Schedules A and B quarterly and submit the revised schedules to NRC, beginning three months following NRC concurrence in the Plan. In addition to updating the schedules, BECO will:

- o Summarize progress in implementing NRC requirements concerning plant modifications.
- o Identify changes since the last report.
- o Summarize the reasons for schedule changes associated with regulatory requirements.

B. Changes to Schedules

Changes to the schedules may arise from a variety of reasons, such as new work activities; modifications in the scope of scheduled work; problems in delivery, procurement, etc.; changes in NRC rules and regulations; or other NRC or BECO actions.

Where it is necessary to add a new work item or to change the schedule for an item, the following general guidance will be utilized to the extent appropriate:

- o Assess the priority of the work item and its safety significance.
- o Schedule the new or changed item to avoid rescheduling other items, if it can be reasonably achieved.
- o Alter Schedule B items before Schedule A items.
- o Select a schedule for the new or changed item which will help in maintaining an optimum integrated program of work.

As noted above, no changes will be made in Schedule A without prior NRC approval. Should a change become necessary, it will only be proposed after Boston Edison has determined that rescheduling of non-NRC required work items either will not significantly assist in maintaining Schedule A without change; or that the safety, cost or schedule penalties from rescheduling non-NRC required work significantly outweigh the change in a Schedule A completion date.

Boston Edison will inform the NRC Project Manager when serious consideration is given to requesting a change in Schedule A. When BECO determines that a change in Schedule A is necessary, it will submit a written request for NRC approval in accordance with applicable procedures.

Work items in Schedule B may be rescheduled or work items may be added to Schedule B by Boston Edison without NRC approval; however, BECO will inform the NRC Project Manager when serious consideration is given to changing the schedule for or adding an item in Schedule B.

In addition, at least 30 days (unless otherwise agreed to by the NRC Project Manager or unless circumstances beyond BECo's control arise within 30 days of the scheduled date) before BECo adopts a change for an item in Schedule B (as defined in Section III above), it will provide the NRC written notification thereof, including the reasons therefor and any compensatory actions instituted. If not provided 30 days in advance, such notification will be provided by BECo as promptly as practicable. NRC may request further explanation or discussion concerning such change. In this event, discussions will be initiated with the NRC Project Manager. However, BECo changes in scheduled dates will be effective unless subsequently modified by BECo.

VI. NRC Review

As pointed out in Section V.B above, changes to the schedules are inevitable. Action required by NRC is discussed below:

A. Boston Edison Originated Changes

1. Upon receipt from BECo of a request for modification of Schedule A, NRC will act promptly (consistent with resource availability and priority of other work) to consider and decide on the request in accordance with applicable procedures.
2. If the request for a modification of Schedule A is denied, NRC shall promptly inform Boston Edison and provide the reasons for denial.
3. NRC consideration of BECo changes in non-Schedule A items is covered by V.B.

B. NRC Originated Changes (Schedule A)

It is recognized that formal NRC regulatory actions may: (1) impose a new regulatory requirement with a fixed date or (2) establish a firm date for a previously identified regulatory requirement. In taking any such action the NRC, to the extent consistent with its overall regulatory responsibilities and, unless public health, safety, or interest require otherwise, will take into account the impact of such action on BECo's ability to complete effectively the items on Schedules A, and B, and, in consultation with BECo, will try to minimize such impact. Although any formal regulatory action taken by the NRC will be effective in accordance with its terms without inclusion in Schedule A, the NRC and BECo recognize the desirability of incorporating such action into Schedule A, particularly in order to incorporate at the same time any other appropriate changes in the total integrated schedule program. Accordingly, once such formal regulatory action is taken (or earlier, if practicable), the NRC will provide BECo a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such requirements. Any resulting changes in items in Schedule A will be approved by NRC in accordance

with established procedures, and will thereupon be reflected in a revised Schedule A submitted by BECo. BECo will inform the NRC of any resulting changes in Schedule B in accordance with Section V. above.

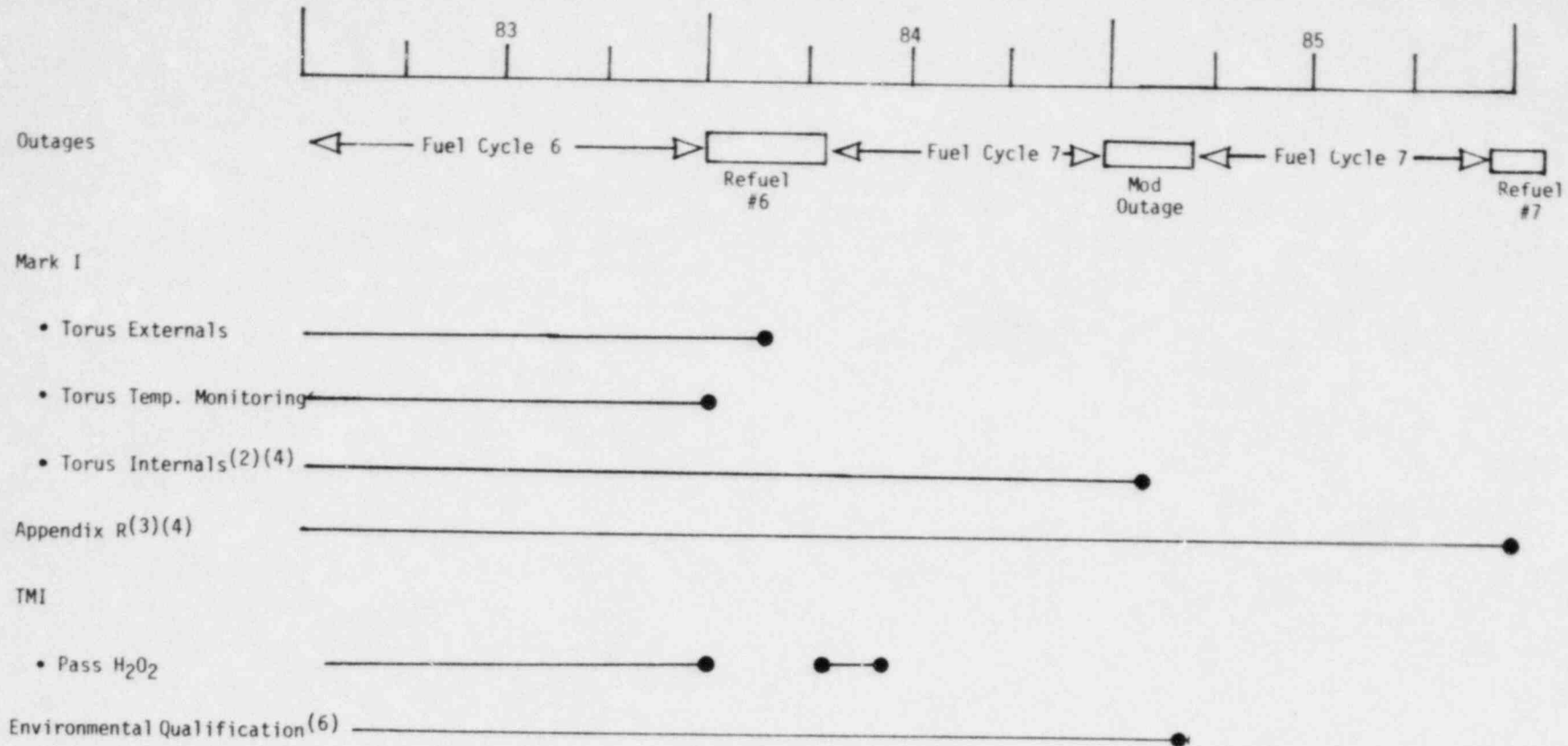
C. New NRC Issues (Schedule B)

The NRC may, from time to time, identify new regulatory issues which may result in a) plant modifications, b) procedure revision or development, or c) changes in facility staffing requirements. For issues as to which NRC requests scheduling information, these issues may be included in Schedule B in accordance with the date commitment developed in discussions between BECo and the NRC staff. As for the case of NRC-originated changes to Schedule A items, the NRC will provide BECo a reasonable opportunity to propose overall changes in the total integrated schedule program which would most effectively accommodate such issues. Any resulting changes in integrated program schedules will thereupon be reflected in a revised Schedule B submitted by BECo.

VII. Modifications to the Plan

The licensee and the NRC recognize that the Plan itself may require future modifications. Accordingly, BECo will draft proposed modifications and submit a license amendment application for approval of the proposed changes. The changes will be made effective upon amendment issuance by NRC.

Schedule A



1 Completion Date Coincident with end of R.O. #6

2 Completion Date Coincident with end of Mod Outage

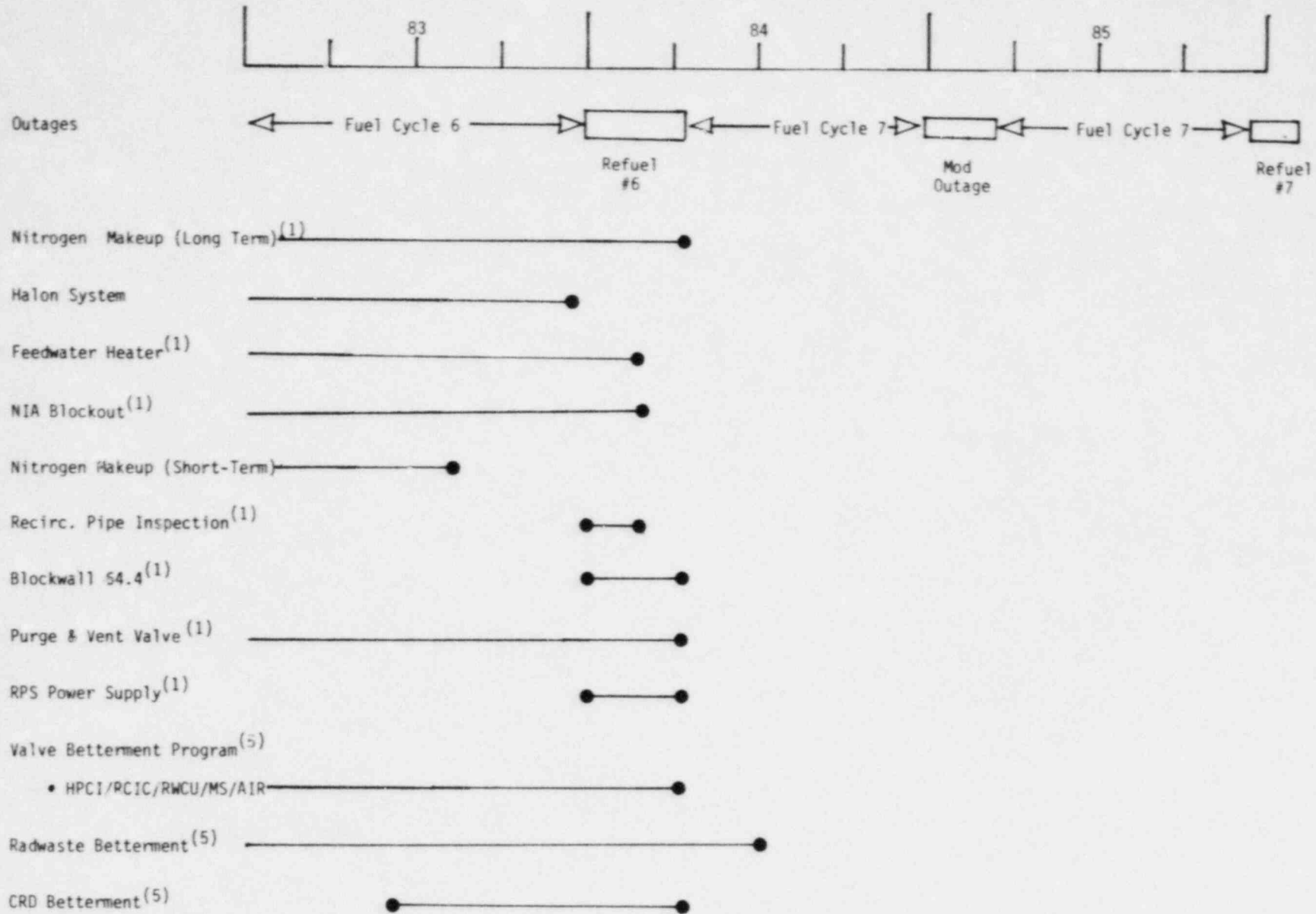
3 Completion Date Coincident with end of R.O. #7

4 Schedule based upon BECo submittal. Final schedule based upon NRC review and approval of submittal.

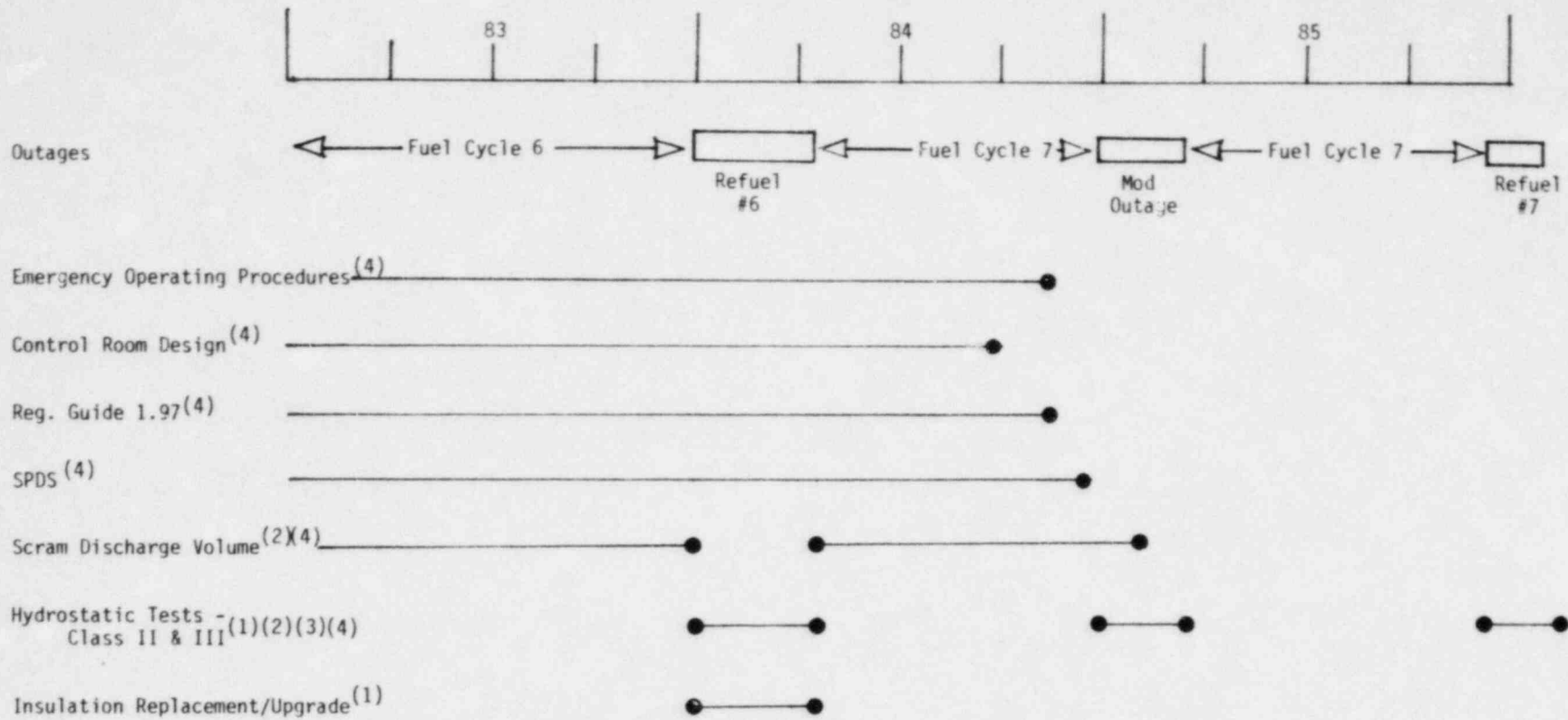
5 Schedule reflects present Betterment Program scope. Expanded scope will be reflected in subsequent updates.

6 Schedule reflects 10 CFR 50.49 deadline. Ongoing BECo assessment may identify the need for schedular extensions within the provisions of 10 CFR 50.49(g).

Schedule B



Schedule B (Continued)



1 Completion Date Coincident with end of R.O. #6

2 Completion Date Coincident with end of Mod Outage

3 Completion Date Coincident with end of R.O. #7

4 Schedule based upon BECo submittal. Final schedule based upon NRC review and approval of submittal.

5 Schedule reflects present Betterment Program scope. Expanded scope will be reflected in subsequent updates.

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