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BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

Ronald Eato
57 FR 5486

11/20/92

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E. T. Boulette, PhD
Senior Vice President — Nuclear

March 15, 1993
BECo Ltr 93-035

Chief, Rules and Directives Review Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

License DPR-35
Docket 50-293

Proposed NRC Generic Communication,
Augmented Inservice Inspection Requirements for
Mark I and Mark II Steel Containments, Refueling Cavities and Associated
Drainage Systems, 57 FR 54860, dated November 20, 1992

Reference: 1. BECo Letter, 92-135, dated December 21, 1992
2. BWROG Letter (BWROG-93027) to Mr. S. J. Chilk,
Secretary, USNRC, dated February 19, 1993

Dear Sir:

Boston Edison Company has previously provided comments (Reference 1) on the NRC proposed Generic Communication on Augmented Inservice Inspection Requirements for Mark I and Mark II Steel Containments, Refueling Cavities and Associated Drainage Systems. This letter provides our concurrence and endorsement of the comments provided by Boiling Water Reactor Owners' Group (BWROG) letter (Reference 2).

Boston Edison is a participant in the BWROG. The comments presented in the BWROG letter were developed with BECo's participation, taking into account the Pilgrim plant-specific design features and activities implemented at Pilgrim to address containment integrity issues requested by the NRC in Generic Letter 87-05.

As stated in the referenced BWROG letter, Boston Edison Company also does not believe the program reflected in the proposed generic letter is technically justified or cost-effective and recommends against issuance of the generic letter as proposed. In addition, we hereby endorse the referenced BWROG comments and positions offered to the NRC on behalf of the BWR owner's.

Sincerely,

E. T. Boulette
E. T. Boulette

WL/cab/REFGCAI
cc: Next page

TO: U. S. NRC
FROM: E. T. Boulette

DATE: 3/15/93
PAGE 2

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Senior NRC Resident Inspector
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