

BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

Ralph G. Bird
Senior Vice President — Nuclear

August 9, 1990
BECO 90-036

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

License DPR-35
Docket 50-293

PROPOSED CHANGE TO TECHNICAL SPECIFICATION
SECTION 6: ADMINISTRATIVE CONTROLS

Boston Edison Company (BECO) proposes the attached changes to Appendix A of Operating License No. DPR-35 in accordance with 10CFR50.90. The changes make minor corrections and improvements to Pilgrim's administrative technical specifications consistent with current Standard Technical Specifications. The changes are also consistent with the "Improved BWR Technical Specifications for BWR/4's".


R. G. Bird

PMK/jmm/4555

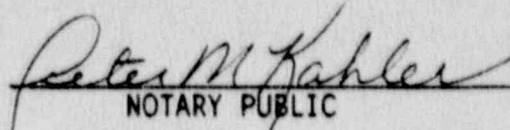
Attachments: (A) Description of Proposed Change
(B) Amended Technical Specification Pages
(C) Marked-up pages from Current Technical Specifications

Commonwealth of Massachusetts)
County of Plymouth)

Then personally appeared before me, Ralph G. Bird, who being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company 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 5, 1995
DATE


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BOSTON EDISON COMPANY

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cc: Mr. R. Eaton, Project Manager
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation
Mail Stop: 14D1
U. S. Nuclear Regulatory Commission
1 White Flint North
11555 Rockville Pike
Rockville, MD 20852

U. S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Senior NRC Resident Inspector
Pilgrim Nuclear Power Station

Mr. Robert M. Hallisey, Director
Radiation Control Program
Massachusetts Department of Public Health
150 Tremont Street, 2nd Floor
Boston, MA 02111

ATTACHMENT A

Proposed Change

Boston Edison Company (BEC) proposes minor changes to section 6 of Pilgrim Nuclear Power Station's (PNPS) Technical Specifications. The proposed change makes minor nomenclature changes consistent with Standard Technical Specifications; removes the requirements that the Technical Section Manager must hold a Senior Reactor Operator License; removes the requirement that the Operations Review Committee (ORC) Chairman be the Technical Section Manager; substitutes a requirement of "within 24 hours" for "immediately" for reporting disagreements between ORC members and the ORC Chairman to the Senior Vice President-Nuclear; corrects the reference to 10CFR50.36 (c)(1)(i) to 10CFR50.36 (c)(1)(i) (A) concerning actions to be taken if a safety limit is violated; extends the allowable ORC review time from 7 days to 14 days for temporary changes to procedures; and renumbers the pages.

Reason for Change

The changes are proposed to make Pilgrim's Technical Specifications more consistent with BWR Standard Technical Specifications, to allow greater choice in who may fill the positions of Technical Section Manager and Operations Review Committee Chairman, and to correct minor flaws.

Safety Evaluation and Determination of No Significant Hazards Consideration

The Code of Federal Regulations (10CFR50.91) requires licensees requesting an amendment to provide an analysis, using the standards in 10CFR50.92, that determines whether a significant hazards consideration exists. The following analysis is provided in accordance with 10CFR50.91 and 10CFR50.92 for the proposed amendment Section 6 of Pilgrim's Technical Specifications.

1. The operation of Pilgrim Station in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This proposed amendment does not alter any equipment configuration or equipment.

Removing the SRO requirement currently imposed on the Technical Section Manager is administrative, is consistent with STS, and allows a wider range of candidates for the position. The removal of the SRO requirement does not affect the safe operation of the plant because the holder of the position must meet the requirements of the American National Standards Institute N18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants", in accordance with Pilgrim Technical Specification 6.3, "Unit Staff Qualifications". Removing the requirement that the ORC Chairman be the Technical Section Manager does not impact plant safety for the same reasons.

Substituting "within 24 hours" for "immediately" for reporting disagreements between ORC members and the ORC Chairman is to provide a concrete, measurable time period in place of the vague "immediately". The 24 hour period is consistent with Standard Technical Specifications.

Adding an (A) to correct the reference to 10CFR50.36(c)(1)(1)(A) does not impact the safe operation of Pilgrim, and is strictly administrative. Changing "Facility" to "Unit" is a nomenclature change consistent with Standard Technical Specifications and is administrative and does not impact safety. Numbering the pages sequentially is also strictly administrative with no impact on safe operation.

Extending time allowed for the ORC to review temporary changes to procedures from 7 to 14 days is consistent with Standard Technical Specifications. It is an administrative change that is made to reduce the number of special, single-purpose ORC meetings convened solely to satisfy the 7 day requirement.

Adding a reference that 6.9.B was deleted as part of Amendment #88 has no impact on safety. It reflects an earlier amendment and is made to explain the numbering sequence in consideration of the blank pages being removed from Technical Specifications. Deleting "d" from Table 6.9.1 reflects Amendment #89 of March 1, 1986 which incorporated the Radiological Effluent Technical Specifications (RETS) into Pilgrim's Technical Specifications. Amendment #89 makes 6.9.1.d unnecessary and its removal is administrative with no impact on safety.

The proposed changes are administrative and are consistent with Standard Technical Specifications. The proposed changes do not alter the configuration of Pilgrim, or the operation of equipment; hence, the operation of Pilgrim in accordance with the proposed changes does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The operation of Pilgrim Station in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not alter equipment configuration or equipment. It is administrative and is consistent with Standard Technical Specifications; therefore, operating Pilgrim Station in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The operation of Pilgrim Station in accordance with the proposed amendment will not involve a significant reduction in the margin of safety.

The proposed administrative changes do not affect equipment or processes impacting the margin of safety; hence, operating Pilgrim in accordance with the proposed changes does not involve a significant reduction in the margin of safety.

This change has been reviewed and approved by the Operations Review Committee and reviewed by the Nuclear Safety Review and Audit Committee.

Schedule of Change

This change will be implemented within 30 days following BECo's receipt of its approval by the Commission.

ATTACHMENT B