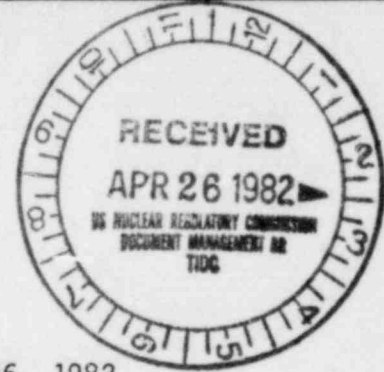


BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199



April 16, 1982

BECO. Ltr. #82-105

Mr. Darrell G. Eisenhut, Director
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

Response to NRC Generic Letter No. 82-05
(Post TMI Requirements)

Dear Sir:

The subject letter requested Boston Edison Company to establish firm schedules or reconfirm previously submitted schedules concerning implementation of the NUREG 0737 items identified in your letter as Enclosure 1. For those items already completed, no further information other than the date of completion was requested. Conversely, proposed dates for completion of remaining items were requested along with the following information:

- a) justification for proposed schedule,
- b) demonstration of need for proposed schedule and
- c) description of compensatory measures to be taken in the interim.

Please be advised that we are currently in the process of compiling a comprehensive list of all activities requiring implementation over the next few years at Pilgrim Station. An integrated plan for closeout of these activities will then be developed from this list. Once this plan is developed, we intend to present and discuss with appropriate members of your Licensing Staff, our methodologies utilized for prioritizing/scheduling, and based on staff input adjust these schedules accordingly. Since some of the 0737 items identified in your letter will be included in this integrated plan, no projected completion date can be proposed at present. We would, however, expect that your staff will provide sufficient input during the upcoming discussions, to enable the proper priorities to be assessed on these items when evaluated in context with all other identified requirements to be implemented at Pilgrim. The interim compensatory measures referenced on Attachment A will remain in effect as appropriate.

8204270816

A046
5/11

BOSTON EDISON COMPANY

Mr. Darrell G. Eisenhut, Director
April 16, 1982
Page 2

We are also reviewing the modifications installed and operable to date for possible deviations from the NUREG positions that have not previously been identified to your office. This review will be completed by May 17, 1982, at which time we will apprise you of our findings.

Should you require additional information, beyond that provided in Attachment A to this letter, please contact us.

Very truly yours,

William H. Deacon

Attachment

Commonwealth of Massachusetts)
County of Suffolk)

Then personally appeared before me William H. Deacon, who, being duly sworn, did state that he is Acting Manager of Nuclear Operations Support of Boston Edison Co., 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 22, 1988

Peter W. Kahler
Notary Public

ATTACHMENT A

References

- (a) Jan. 25, 1982 BECo. Ltr. 82-24
- (b) Feb. 5, 1982 BECo. Ltr. 82-46
- (c) FEB. 27, 1981 BECo. Ltr. 81-44
- (d) April 7, 1982 BECo. Ltr. #82-100
- (e) Dec. 3, 1981 BECo. Ltr. 81-276
- (f) June 29, 1981 BWROG Ltr. 81-49

I.A.3.1 Simulator Exams

This has been implemented per our commitments addressing this NUREG item. Implementation occurred prior to startup from Refueling Outage #5. Reference (d) provided additional clarification on this item.

II.B.2 Plant Shielding

The shielding study report for personal habitability was performed per our commitments on this NUREG item by Jan. 1, 1982, and is available for your review.

An engineering evaluation for shielding of equipment will be performed in conjunction with our response to the 79-01B IE Bulletin.

Modifications to plant systems, i.e. the new Post Accident Sampling System and the Containment Hydrogen/Oxygen Monitoring System, will be scheduled for implementation via BECo's integrated plan. Ref. (a) provided justification and compensatory measures regarding this item.

II.B.3 Post Accident Sampling

Implementation will be scheduled via BECo's integrated plan. Ref. (a) provided our justification and compensatory measures taken on this item.

II.B.4 Training For Mitigating Core Damage

This has been implemented per our commitments addressing this NUREG item. Implementation occurred prior to startup from Refueling Outage #5.

II.E.1.2 Aux. Feedwater Initiation & Flow Indicator

This item is not applicable to BWR's

II.F.1 Accident Monitoring

Parts 1-5 have been implemented per our commitments addressing this NUREG item. Implementation occurred prior to startup from Refueling Outage #5. Reference (a) provided our justification and compensatory measures taken on Part 6 of this item. Implementation will be scheduled via BECo's integrated plan.

II.K.2.10 Safety Grade Trip

This item is not applicable to BWR's.

II.K.3.15 HPCI and RCIC Isolation Modification

This has been implemented per our commitments addressing this NUREG item. Implementation occurred prior to startup from Refueling Outage #5.

II.K.3.19 Interlock on Recirc. Pump

This item is not applicable to PNPS.

II.K.3.22 Automatic RCIC Suction Switchover

Ref. C provided our position on this item. This has been implemented per our commitments addressing this NUREG item and no modifications are planned.

II.K.3.24 Space Cooling for HPCI/RCIC

Ref. E provided our position on this item and no modifications are planned at this time.

II.K.3.27 Common Reference Level

Ref. B provided our position and implementation schedule on this item. Implementation will be re-considered via BECo's integrated plan.