



Boston Edison

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

10CFR50.90

L. J. Olivier

Vice President Nuclear Operations
and Station Director

September 6, 1994

BEC0 94- 098

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

License DPR-35
Docket 50-293

Proposed Technical Specification Change to
Maintenance of Filled Discharge Pipe

Boston Edison Company (BEC0) hereby proposes the attached modification to Appendix A of Operating License No. DPR-35 in accordance with 10CFR50.90. This proposed change removes section 4.5.H.4, a section which requires the testing and calibration of pressure switches in certain ECCS discharge lines. Bases are changed to provide information on the venting requirement.

This change reflects the Standard Technical Specifications. It is proposed as a cost beneficial licensing action (CBLA) because the change could prevent an unnecessary plant shutdown. Preventing a single shutdown meets or exceeds the NRC's financial criterion for classifying this proposed change a CBLA.

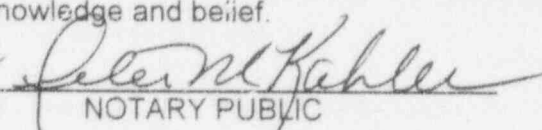
The requested changes are described in Attachment A. The revised Technical Specification pages are provided in Attachment B. Attachment C provides the existing pages marked-up to show the proposed changes.


L. J. Olivier

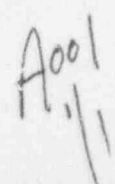
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Commonwealth of Massachusetts)
Country of Plymouth)

Then personally appeared before me, L. J. Olivier, who being duly sworn, did state that he is Vice President - Nuclear Operations and Station Director 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.

1 My commission expires: October 5, 1998 
DATE NOTARY PUBLIC

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BOSTON EDISON COMPANY

U. S. Nuclear Regulatory Commission

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

1 signed original and 37 copies

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ATTACHMENT A TO BECO LETTER 94-098

Proposed Change

A change is proposed removing Technical Specification section 4.5.H.4, thereby removing the Emergency Core Cooling System (ECCS) discharge piping pressure switches from Technical Specifications. Procedural controls will be used to ensure that the pressure switches, which are surveillance instruments, remain calibrated and operable.

Reason for Change

Section 4.5.H.4's requirements if not met, would require Pilgrim to be placed in cold shutdown or to declare as inoperable an otherwise operable associated ECCS system. However, these switches are surveillance instruments and do not provide a signal needed to prevent or mitigate an accident. Further, they are not the primary means of preventing ECCS discharge piping water hammer. Therefore, removing these switches from Technical Specifications does not impact safety and is a cost beneficial licensing action (CBLA) because preventing a single shutdown over the remaining life of Pilgrim provides savings that meet or exceed the NRC's financial criteria.

In addition, these switches are not included in Standard Technical Specifications and this proposed change conforms with the NRC's initiative to remove superfluous items from Technical Specifications.

Safety Evaluation and Determination of No Significant Hazards Evaluation

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.

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. The discharge piping for ECCS systems is maintained filled and vented to prevent water hammer during automatic pump starts.

The discharge piping for ECC systems is maintained filled to prevent water hammer during automatic pump starts. Monthly venting is the primary means of ensuring filled discharge piping. The pressure switches are an adjunct to such venting. Hence, piping in the Core Spray System, the Low Pressure Coolant Injection System (LPCI), the High Pressure Coolant Injection (HPCI) system, and the Reactor Core Isolation Coolant (RCIC) system are all equipped with pressure switches that detect pressure decay in the discharge piping of these systems.

This proposed change does not change Pilgrim's configuration or equipment. The switches perform a surveillance function and do not provide a signal needed to prevent or mitigate an accident. The switches will continue to perform their surveillance function and their surveillance and calibration will be performed in accordance with Pilgrim procedures. Removal of section 4.5.H.4 eliminates the possibility of inoperable switches forcing the shutdown of Pilgrim or the alternative of declaring an operable safety system inoperable because of its association with these switches.

Technical Specifications will continue to require venting the discharge piping high point when the systems are configured such that water hammer can occur. (sections 4.5.H.1, 4.5.H.2 and 4.5.H.3). Thus, the application of this proposed change does not reduce the Technical Specification's intent of reducing the likelihood of discharge piping water hammer. Therefore, operating Pilgrim Station in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously analyzed.

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.

Section 4.5.H's purpose is to maintain the ECCS discharge piping filled to prevent water hammer. The purpose of the pressure switches is to detect voids in ECCS discharge piping to prevent the possibility of damage due to water hammer. These switches are not safety-related, have no automatic functions, and are not relied on to prevent or mitigate an accident. Instead, they enhance the existing discharge pipe venting surveillance requirements by detecting void formation in discharge pipe.

The switches will continue to perform their surveillance function through Pilgrim procedures. Venting will continue to be required by Technical Specifications. Therefore, operating Pilgrim in accordance with this proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change does not impair the detection of conditions necessary to produce a water hammer in the discharge piping.

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

The discharge piping pressure switches are surveillance instruments and act as a secondary means of protecting the discharge piping from conditions that can produce water hammer. They are not relied on to prevent or mitigate accidents. Hence, these switches do not significantly impact safety because they are not the primary means of preventing discharge piping water hammer. Therefore, removing the pressure switches from Technical Specifications potentially contributes to plant availability but does not involve a significant reduction in a margin of safety because the primary method of detection (venting) remains and the switches will continue to be subject to procedural controls.

This proposed change has been reviewed and recommended for approval by the Operations Review Committee and reviewed by the Nuclear Safety Review and Audit Committee.

Schedule of Change

This change will become effective 30 days following BECo's receipt of the Commission's approval.

Attachment B to BECo Letter 94-098

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