

BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

April 15, 1983
BEC Co Letter No. 83-93
Proposed Change #83-4

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

Subject: Radiological Effluent and Environmental Monitoring Technical Specifications (RETS)

Dear Sir:

Pursuant to Section 50.90 of the Commission's Rules and Regulations, Boston Edison Company hereby proposes the following modifications to Appendix A of the Operating License. This submittal replaces and voids a proposal contained in a Boston Edison letter dated February 21, 1979, which was subsequently modified by a Boston Edison letter dated July 2, 1979.

Proposed Change

Reference is made to Operating License No. DPR-35 and the Technical Specifications contained in Appendix A. The proposed changes are contained in the pages of Attachment B of this submittal, and whose disposition is described below:

Replace pages in kind:

Table of Contents: ii, iii

Definitions: 5a

Other: 177, 178, 179, 179a, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 213, 215, 222, 223, 223a

Remove and do not replace:

179b, 183a, 183b, 183c, 183d, 185a, 185b, 185c, 185d, 187a, 187b, 187c, 187d, 191a, 191b, 223b

Add new pages:

Definitions: 5b, 5c

LC0: 178a, 178b, 178c, 178d, 181a, 181b, 181c, 181d, 181e, 181f, 182a, 182b, 213a, 215a

A009
1/40

BOSTON EDISON COMPANY

Mr. Domenic B. Vassallo, Chief
April 15, 1983
Page 2

Operational Objectives: 229, 229a, 229b, 229c, 229d, 229e, 229e, 229f, 229g, 229h, 229i, 229j, 229k, 229l, 229m, 229n, 229o, 229p, 229q, 229r, 230, 231, 232, 233, 233a, 234, 235, 236, 237, 238, 239

Reason for Change

The proposed changes respond to NRC requests that Boston Edison amend Pilgrim Station's Operating License. These requests were contained in letters dated July 11, 1978 and November 15, 1978. We initially responded by submitting a proposed change February 21, 1979.

Subsequent discussion between Boston Edison and the NRC resulted in a variety of changes which have been incorporated into the present submittal. This submittal supersedes in it's entirety, that of February 21, 1979.

Safety Considerations

The proposed technical specifications are intended to implement the following Federal Regulations; 10CFR50.34a(a), 10CFR50.36a, 10CFR20, 10CFR50, Appendix A, General Design Criteria 60 and 64, and 40CFR190.

These changes have been reviewed by the Nuclear Safety Review and Audit Committee (NSRAC) and reviewed and approved by the Operations Review Committee (ORC).

Schedule of Change

We request that these changes become effective 120 days after receipt of NRC approval. This is to allow adequate time to modify affected procedures and to provide operator training, thereby ensuring proper implementation.

Fee Determination

The major portion of the proposed change is an extension of the 10CFR Part 50, Appendix I design study submitted to the USNRC on June 2, 1976, and constitutes completion of the requirements of Appendix I for the submittal of technical specifications. Since fees were not applicable when the requirements put forth by Appendix I to 10CFR Part 50 became effective, and since the submittal of this has been delayed to allow the receipt and assimilation of guidance from the NRC, we believe that this amendment is exempt from any fees defined in 10CFR Part 170.121 (c).

Additional Information

- (1) We have provided justification for our revisions concerning items of Standard RETS not applicable to Pilgrim. These items are contained in Attachment A.

BOSTON EDISON COMPANY

Mr. Domenic B. Vassallo, Chief
April 15, 1983
Page 3

- (2) We have implemented a new section of technical specifications (Section 7), titled "Operational Objectives." The technical specifications selected for insertion into this section were carefully reviewed against our definition of Limiting Condition of Operation (LCO) and determined to be outside the intent of this definition. Thus by placing them into the operational objective section we have preserved the regulatory aspect of the technical specification yet lessened the potential impact on operations.
- (3) We intend to provide NRC with our proposed Offsite Dose Calculation Manual (ODCM) in approximately four weeks. This will allow approval by the ORC and review by NSRAC.

Very truly yours,

W.D. Harrington

- Attachments A: Justifications for Revisions from STS
- B: Proposed Radiological Effluent and Environmental Monitoring Technical Specifications (RETS)

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. Kahle
Notary Public



ATTACHMENT A

JUSTIFICATION FOR PNPS REVISED RETS NOT
ADDRESSING CERTAIN ITEMS IN STANDARD
TECHNICAL SPECIFICATIONS (STS) FOR BWRs

ITEMS MISSING
FROM STS BWRs

JUSTIFICATION

I. 1.0 DEFINITIONS

- A. 1.30 Process Control Program (p. 1-2). PNPS does not have a Process Control Program.
- B. 1.31 Solidification (p. 1-3). This definition applies to the Process Control Program which PNPS does not have.
- C. 1.34 Ventilation Exhaust Treatment System (p. 1-3). Not applicable to PNPS as a system during normal operations.

II. 3/4.11 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

A. LIQUID EFFLUENTS - INSTRUMENTATION

1. 3.3.7.11, Table 3.3.7.11-1, #2 - Gross Radioactivity Monitors not providing automatic termination of release, plus ACTION 112 (p. 3/4 3-75). PNPS does not have these monitors. Therefore, grab samples will be obtained and analyzed on a weekly basis.
2. 3.3.7.11, Table 3.3.7.11-1, #5 - Tank Level Indicating Devices (for tanks outside plant buildings) (p. 3/4 3-74). PNPS does not have any temporary tanks outside of plant buildings. The only outside tanks are Condensate Storage Tanks and this item is not meant to address the CSTs.
3. 3.3.7.11, Table 4.3.7.11-1, #2 - Gross Beta or Gamma Radioactivity Monitors Providing Alarm but not providing automatic termination of release (p. 3/4 3-76). PNPS does not have these monitors. Therefore, a grab sample will be obtained and analyzed on a weekly basis.
4. 3.3.7.11, Table 4.3.7.11-1, #5 - Tank Level Indicating Devices (for tanks outside the building) (p. 3/4 3-77). PNPS does not have any tanks outside the buildings other than the Condensate Storage Tanks.

B. GASEOUS EFFLUENTS - INSTRUMENTATION

1. 3.3.7.12, Table 3.3.7.12-1, #1 - 2A & 2B - Main Condenser Offgas Treatment System (p. 3/4 3-60). This system is tied into the Main Stack effluent pathway.

ITEMS MISSING
FROM STS BWRs

JUSTIFICATION

- | | |
|---|--|
| 8. 3.3.7.12, Table 4.3.7.12-1, #6 - Auxiliary Building Ventilation Monitoring System, and #7, Fuel Storage Area Ventilation Monitoring System (p. 3/4 3-67). | These building ventilation monitoring systems are not applicable to this BWR. |
| 9. 3.3.7.12, Table 4.3.7.12-1, #8 - Radwaste Area Ventilation Monitoring System, and #9 - Turbine Gland Seal Condenser Vent and Mechanical Vacuum Pump Exhaust Monitoring System (p. 3/4 3-67). | The Radwaste Area is tied into the Reactor Building Vent, and Turbine Gland Seal Condenser ventilation is tied into the Main Stack effluent Pathway. |
- C. LIQUID WASTE TREATMENT
- | | |
|-----------------------------------|--|
| 1. 3.11.1.4, Liquid Holdup Tanks. | PNPS currently does not have, nor expects to have, temporary liquid holdup tanks outside of the plant. |
|-----------------------------------|--|
- D. GASEOUS EFFLUENTS - DOSE RATE
- | | |
|---|--|
| 1. 3.11.2.1, Table 4.11-2, A - Waste Gas Storage Tank, and B - Containment Purge (p. 3/4 11-9). | Waste Gas Storage Tank and Containment Purge are not applicable to PNPS. |
| 2. 3.11.2.1, Table 4.11-2, Table Notation, #e (p. 3/4 11-9). | Not applicable to PNPS. |
- E. GASEOUS RADWASTE TREATMENT
- | | |
|---|---|
| 1. 3.11.2.5, Ventilation Exhaust Treatment (p. 3/4 11-15). | Ventilation Exhaust Treatment is not applicable to PNPS as a system during normal operations. |
| 2. 3.11.2.6, Explosive Gas Mixture (Systems designed to withstand a hydrogen explosion) (p. 3/4 11-16). | This system is not applicable to PNPS. |
| 3. 3.11.2.8, Mark I or II Containment (Optional) (p. 3/4 11-19). | This item is optional. |
- F. SOLID RADIOACTIVE WASTE
- | | |
|--|---|
| 1. 3.11.3, Process Control Program (p. 3/4 11-21). | PNPS does not have a Process Control Program. |
|--|---|

ITEMS MISSING
FROM STS BWRs

JUSTIFICATION

III. BASES

- A. 3/4.11.1.4 Liquid Holdup Tanks
- B. 3/4.11.28 Mark I or II Containment (Optional)
- C. 3/4.11.3 Solid Radioactive Waste

PNPS does not have, nor expects to have, temporary liquid holdup tanks outside of the plant.

This item is optional

PNPS does not have a Process Control Program.

IV. ADMINISTRATIVE CONTROLS

- A. 6.13 Process Control Program.

PNPS does not have a Process Control Program.

V. REPORTING REQUIREMENTS

- B. 6.9.C.2 Annual Radiological Environmental Monitoring Report.

The Annual Radiological Environmental Monitoring Report will not include comparisons to the preoperational studies. Unfortunately, the preoperational environmental study results for PNPS are too general for a meaningful comparison to current environmental program results.

ATTACHMENT B