

BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

May 10, 1983
BECO Letter No. 83-117

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: Request for Scheduling Relief
Scram Discharge Volume Modifications

- References: (A) Boston Edison Company (BECO) Letter No. 81-38 (W.G. Merritt to D.G. Eisenhower), dated February 13, 1981.
- (B) BECO Letter No. 81-83 (A.V. Morisi to T.A. Ippolitto), dated April 21, 1981.
- (C) BECO Letter No. 82-157 (A.V. Morisi to D.B. Vassallo) dated May 26, 1982.
- (D) BECO Letter No. 83-91 (W.D. Harrington to D.G. Eisenhower), dated April 14, 1983.

Dear Sir:

Reference (A) transmitted Boston Edison Company's (BECO) original proposed Scram Discharge Volume modifications. In References (B) and (C), BECO subsequently revised both the scope of the modifications and the implementation schedules. The modification changes were in response to NRC requests for changes and clarification. The scheduling changes were due to problems with component procurement and unforeseen delays in completing the total system design.

On April 14, 1983, BECO met with members of your staff to present its Long Term Program and schedule, which was subsequently transmitted to you in Reference (D). As discussed during that meeting, the primary objective of BECO's Long Term Program is to enhance the safe operation of the plant by balancing the improvements required by the Regulators and our Management, while allowing the appropriate levels of controls to be exercised. The key decisions to allow the above to occur include: maintaining area manloading densities at a controllable level; focusing and directing the organization's efforts toward a specific set of goals and schedules; and committing to a mid-cycle modifications outage. The Scram Discharge Volume modification has been identified as a major project which requires rescheduling to accomplish the above Long Term Program goals.

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We believe that the completion date should be modified to February 23, 1985, and have provided the following information to support this schedular relief.

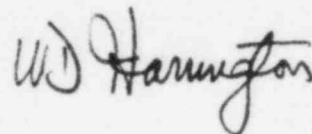
The mechanisms involved in the Browns Ferry incident (i.e. poor hydraulic coupling and system back pressure from combined systems drainage lines) are not present at Pilgrim Station because:

- a) the piping and vent layout allows for proper draining. Additional vacuum breaker valves have been installed directly on each of the two Scram discharge headers.
- b) SDV drains are dedicated, with no system tie-in's which could provide a source of back pressure,
- c) Pilgrim has not experienced any significant problems with level instrumentation,
- d) a Continuous Monitoring System employing sonic detectors has been installed to detect possible water buildup in the headers, which further reduces any potential risk of this type. This system has demonstrated a high level of reliability,
- e) at no time has water buildup been detected in the headers, and
- f) an "Automatic Air Header Dump" system has been installed to ensure a full SCRAM upon detection of decreasing air header pressure.

In summary, we believe that the ability to ensure a full SCRAM at Pilgrim Station remains highly reliable.

Your attention to this item is greatly appreciated. We believe that the information provided is adequate to enable you to grant the requested schedular relief. Should you require any additional information or have any questions, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "W.D. Harrington". The signature is written in a cursive, flowing style with a large, prominent "H".