



Boston Edison

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

10CFR50.90

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U. S. Nuclear Regulatory Commission
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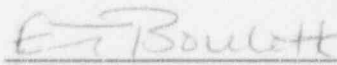
License DPR-35
Docket 50-293

**Proposed Technical Specification Changes
to Tables 3.2.C-1 and 4.2.C**

This revises the mode conditions under which the Scram Discharge Instrument Volume-Scram Trip Bypass in Table 3.2.C.1 is required to be operable and changes the associated functional test frequency from quarterly to once per operating cycle in Table 4.2.C.

This change is classified as an administrative change because it revises the technical specification to reflect the actual plant design.

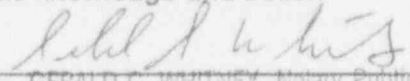
Attachment A contains the change description, Attachment B contains the corrected TS pages and Attachment C contains the marked-up existing TS pages.


E. T. Boulette

Commonwealth of Massachusetts)
County of Plymouth)

Then personally appeared before me, E. T. Boulette, 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: MAR 4 - 1999


GERALD G. WHITNEY, Notary Public
My Commission Expires March 4, 1999

Attachments: (A) Description of Change
(B) Revised Technical Specification Pages
(C) Marked-up Existing Technical Specification Pages

ETB/GGW/TS/nas/SDIV

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Original and 37 copies to NRC DCD

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Attachment A
Administrative Technical Specification Change for
Table 3.2.C-1 and 4.2.C

Description of Change

This change removes the requirement of Table 3.2.C.1 "Instrumentation that Initiates Control Rod Blocks" to have the "Scram Discharge Instrument Volume - Scram Trip Bypassed" operable in the Run and Startup modes. Operability for this instrumentation is applicable only in the Shutdown and Refuel modes. Also, the quarterly functional surveillances of Table 4.2.C are being revised to once/cycle to coincide with the period of time the instrumentation is required to be operable.

Reason for Change

PNPS Technical Specification Amendment 110 revised the operability requirements of the control rod block actuation instrumentation (Table 3.2.C.1) in an effort to more closely correspond to the logic design and BWR Standard Technical Specifications. For the instrumentation associated with this proposed change, the Rod Block initiated by the SDIV-Scram Trip Bypassed function is required to be operable in the RUN/STARTUP/REFUEL modes. This function is verified to be operable through quarterly surveillance tests by using a jumper to simulate correct mode switch position to prove the Rod Block is initiated by the SDIV-Scram Trip Bypassed Function. A review of the system logic (M1N19-7 and M1N20-7, Channels A & B, respectively) and FSAR Section 7.2.3.10, "Scram Bypasses", reveals the SDIV-Scram Trip Bypassed instrument channel functions only when the mode switch is in SHUTDOWN or REFUEL. The SDIV-Scram Trip Bypassed function is not electrically aligned in the RUN/STARTUP modes. Because the SDIV-Scram Trip Bypassed does not function when the mode switch is in the RUN/STARTUP mode, the Rod Block initiated by this function should not be required to be operable and tested in these modes. The proposed technical specification change corrects the operability and surveillance requirements for the specified control rod block actuation instrumentation.

This change is classified as an administrative change because it revises the technical specification to reflect the actual plant design.

Design Function:

FSAR section 7.2.3.10 describes the function of the SDIV-Scram Trip Bypass Switch as:

A manual keylock switch located in the control room permits the operator to bypass the scram discharge volume high level scram trip if the mode switch is in SHUTDOWN or REFUEL. This bypass allows the operator to reset the RPS, so that the system is restored to operation while the operator drains the scram discharge volume. In addition to allowing the scram relays to reset, actuating the bypass initiates a control rod withdrawal block. Resetting the trip actuators opens the scram discharge volume vent and drain valves. An annunciator in the control room indicates the bypass condition.

Determination of No Significant Hazards Considerations:

The Code of Federal Requirements, 10 CFR 50.91(a), requires that at the time a licensee requests an amendment, it must provide to the commission its analysis, using the standards in 10CFR50.92, about the issue of no significant hazards consideration. Therefore, in accordance with 10CFR50.91 and 10CFR50.92, the following analysis has been performed.

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 proposed change to Table 3.2.C.1, and the associated change to Table 4.2.C, removes incorrect reactor modes listed for the Scram Discharge Instrument Volume (SDIV) - Scram Trip Bypass function. The Pilgrim control rod block logic for the SDIV Bypass is not operable nor is it required by design when in the Run and Startup modes. The control logic and the FSAR (section 7.2.3.10) specifies SDIV - Scram Trip Bypass operability only in the Refuel and Shutdown modes.

This change will not result in any physical modification or operation of the control rod block system. The change conforms the technical specifications to the actual design of the SDIV Scram Trip Bypass as described in the FSAR. Changing the functional surveillance frequency from quarterly to once per operating cycle also conforms the technical specifications to the applicable mode for the function.

The change is classified as an administrative change because it corrects an administrative requirement that does not reflect the logic design. It improves safety by removing the need to install jumpers during reactor operations to perform unnecessary and potentially risky functional surveillances.

Therefore, because this is an administrative change, operation of Pilgrim will 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.

This proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because it is administrative and requires no physical alteration of the plant configuration, changes to setpoints, or operating parameters.

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

The proposed change serves to enhance the margin of safety by eliminating the potential for error caused by installing jumpers to the control logic during reactor operation. Changing the functional surveillance frequency from quarterly to once per operating cycle also enhances the margin of safety by allowing test

performance off-line, the mode for which the SDIV scram trip bypass control rod blocks are designed to be operable.

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

To maximize its cost benefit we request approval of this change prior to April 1, 1995, the scheduled start of refuel outage number 10 at Pilgrim.

This change will be effective within 30 days of receipt of approval from the NRC.