

**BOSTON EDISON**

Pilgrim Nuclear Power Station
 Rocky Hill Road
 Plymouth, Massachusetts 02360

10CFR50.67
 (proposed) DOCKETED
 USNRC

'95 FEB -9 P3:21

E. T. Boulette, PhD
 Senior Vice President - Nuclear

DOCKET NUMBER
 PROPOSED RULE **PR 50**
 (59PR52707)

OFFICE OF SECRETARY
 DOCKETING

February 3, 1995

BECo Ltr. #95-009

(48)

Secretary
 U.S. Nuclear Regulatory Commission
 Attention: Document Control Desk
 Washington, DC 20555-0001

Docket No. 50-293
License No. DPR-35

Comments on the Proposed Shutdown Rule

Boston Edison Company (BECo) does not support the issuance of the proposed rule, "Shutdown and Low Power Operations for Nuclear Power Reactors", noticed in the Federal Register dated October 19, 1994 (59FR52707). We endorse the comments provided to you by both the Boiling Water Reactor Owners Group (BWROG) and the Nuclear Energy Institute. BECo has participated with both groups on shutdown and low power safety issues and in preparing the comments.

In addition, BECo has voluntarily implemented internal and industry initiatives to improve the conduct of operations during shutdown and low power situations. We will continue to review our experiences and refine our processes based on our and industry's lessons learned. However, we believe the imposition of the proposed rule has the potential to discourage innovation and industry initiatives.

We further believe this rule's implementation will extend the average refueling outage by several days without a significant improvement in safety. Therefore, imposition of this rule is inconsistent with the NRC's intention of helping industry control costs on issues where safety is not significantly improved or impaired. Its promulgation will hamper our efforts to constantly improve refueling outage performance and to enhance nuclear generation's attractiveness in a competitive environment.

ET Boulette
 E. T. Boulette, PhD

ETB/PMK/nas/Rap94/Shutdown

cc: See next page

9502100238 950203
 PDR PR
 50 59FR52707 PDR

DS10

cc: Mr. R. Eaton, Project Manager
Division of Reactor Projects - I/II
Mail Stop: 14D1
U. S. Nuclear Regulatory Commission
1 White Flint North
11555 Rockville Pike
Rockville, MD 20852

U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Senior Resident Inspector
Pilgrim Nuclear Power Station