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SENIOR VICE PRESIDENT
NUCLEAR

October 7, 1983

BECO 83-248

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

Containment Purge and Vent Valve Open Time Limit

Reference: Letter from W. D. Harrington, Boston Edison,
to D. B. Vassallo, NRC, dated July 28, 1983
(BECO 2.83.200)

Dear Sir:

To prepare for the possible replacement of reactor coolant piping at the Pilgrim Nuclear Power Station during Refueling Outage #7, a short planning outage of approximately 3 days is scheduled to begin October 7, 1983. During this planning outage, the as-built configuration of reactor coolant piping susceptible to intergranular stress corrosion cracking (IGSCC) will be studied to allow for the proper planning of a possible piping replacement operation. This planning outage should ultimately reduce the length of Refueling Outage #7, if the replacement of reactor coolant piping at Pilgrim indeed becomes necessary.

As so ordered by the NRC in the IGSCC Inspection Order Confirming Shutdown, dated August 26, 1983, a visual examination for leakage of the reactor coolant piping shall be performed during this planning outage because the outage is anticipated to last 48 hours or more. To perform this visual examination of reactor coolant piping while it is at operating pressure, purging and venting of the drywell atmosphere using the 20-inch containment purge and vent valves will be required to make the drywell habitable while the reactor is still at low power. Low power must be maintained so that the reactor can be kept at operating pressure during the visual examination.

In addition to the above, the 20-inch containment purge and vent valves will be required to be opened during startup to inert the drywell after the piping inspection at a reactor coolant pressure of 600 psi. The use of these valves is required at each plant startup because Technical Specification 3.7.A.5.b requires that the drywell be inerted within 24 hours of placing the reactor in the Run mode.

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As requested by the referenced letter and subsequently granted by Mr. Ken Eccleston of the NRC in a telephone conversation on July 29, 1983, our commitment to limit the open time of the 20-inch containment purge and vent valves during power operation to 90 hours per year was increased to 130 hours per year, for the year 1983 only. At the present, before the start of this planning outage, these valves have been opened a total of 105 hours during power operation in 1983. The purging and venting operations described above for the scheduled planning outage will require approximately 24 hours of additional purge and vent valve open time during power operation, if no problems during shutdown or startup are encountered. Thus, the total accumulated purge and vent valve open time after this planning outage is projected to be approximately 129 hours, which is within the current valve open time limit of 130 hours in 1983.

To allow for the possibility of operational problems that may require exceeding the 130 hour open time limit during this planning outage and for any unscheduled outages that may be required prior to shutdown for refueling on December 10, 1983, it is requested that the open time limit on the 20-inch containment purge and vent valves be extended to 160 hours, for the year 1983 only. It remains our goal to minimize the time that these valves are open to reduce the possibility that these valves will be required to close during a postulated LOCA event.

Very truly yours,

W.D. Harrington
W.D. Harrington

DMV/kc