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EVENT DESCRIPTION AND PROBABLE CONSEQUENCES																			
02										On 4/29/83, it was discovered that T.S. 3.11.D and 4.11.D were not incorporated									
03										into PNPS Technical Specifications. It was found that these T.S. sections were									
04										issued with Amendment 39 and inadvertently deleted by Amendment 42. The unit had									
05										been off-line continuously for a refuel outage prior to the issuance of Amend-									
06										ment 39 (1/8/80) and until after issuance of Amendment 42 (5/12/80). The NRR									
07										Office of the NRC was notified of this event on 5/2/83.									
08																			
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BOSTON EDISON COMPANY  
PILGRIM NUCLEAR POWER STATION  
DOCKET NO. 50-293

Attachment to LER 83-020/01X-1

On 4/29/83, it was discovered that T.S. 3.11.D and 4.11.D were not incorporated into the controlled sets of Technical Specification manuals. These specifications, issued under Amendment #39 on 1/8/80, established LCO's and surveillance requirements to ensure that ascension to power is maintained within the envelope defined by a power/flow limit line. The associated power to flow map that was issued with Amendment 39 was not deleted by Amendment 42. This map explains the allowable reactor operating regions and has been routinely utilized by operations personnel. In addition, automatic protective features, i.e., APRM rod block and scram functions, have been operable.

On 5/2/83, it was determined that T.S. 3.11.D and 4.11.D were inadvertently deleted upon issuance of Amendment #42. On 5/2/83, the Office of Nuclear Reactor Regulation (NRR) was notified of the deletion. BECo was informed by NRR that a future Tech. Spec. Amendment submittal is forthcoming and will include the inadvertently deleted 3.11.D and 4.11.D. Reference page 2 of this attachment for the details of 3.11.D and 4.11.D.

The most probable cause of this event appears to be personnel error resulting from the administrative processing of two separate requests for license amendment on the related technical issues. A revision to PNPS Procedure 8.A.23 was implemented (via SRO change process) to incorporate the missing LCO and its surveillance requirement.

As a result of this event, a study was conducted to determine if the unit was operated outside of the allowable operating region of the power-flow map for the period January 5, 1980 to November 2, 1983. The study revealed that on the following dates, PNPS operated above the rod intercept line.

<u>Date</u>	<u>Pl-Time</u>	<u>Core Thermal Power</u>	<u>Core Flow</u>	<u>Mwt Above Rod Intercept Line</u>
7/18/82	2301	1827	54.5	-
7/18/82	2359	1862	55.6	12
7/19/82	0103	1893	56.5	33
7/19/82	0225	1913	59.6	23
7/19/82	0339	1941	62.5	11
7/19/82	0433	1956	63.9	16
7/19/82	0800	1968	65.1	13
7/19/82	1200	1961	65.9	-

The most probable cause for operation above the rod intercept line was due to a xenon transient during a power increase.

Please be advised that Boston Edison Co. has since submitted and received an extended load line limit analysis Tech. Tech. revision (Amendment 72) which allows operation in the areas identified above.

The deleted LCO, associated surveillance requirement and bases are as follows:

3.11.D. Power/Flow Relationship During Power Operation (LCO)

The power/flow relationship shall not exceed the limiting values shown in Figure 3.11-9. If at any time during power operation it is determined by normal surveillance that the limiting value for the power-flow relationship is being exceeded, action shall be initiated within 15 minutes to restore operation to within the prescribed limits. If the power/flow relationship is not returned to within the prescribed limits within two (2) hours, the reactor shall be brought to the Cold Shutdown condition within 36 hours. Surveillance and corresponding action shall continue until reactor operation is within the prescribed limits.

4.11.D. Power/Flow Relationship During Power Operation (Surveillance Requirements)

Compliance with the power/flow relationship in Section 3.11.D shall be determined daily during reactor operation.

Power/Flow Relationship Bases

The power/flow curve is the locus of core thermal power as a function of flow from which the occurrence of abnormal operating transients will yield results within defined plant safety limits. Each transient and postulated accident applicable to operation of the plant was analyzed along with power/flow line. The analysis justifies the operating envelope bounded by the power/flow curve as long as other operating limits are satisfied. Operation under the power/flow line is designed to enable the direct ascension to full power within the design basis for the plant.

BOSTON EDISON COMPANY  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

February 8, 1984

BECO. #84- 021

Regional Administrator, Region I  
J.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

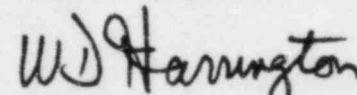
Docket Number 50-293  
License DPR-35

Dear Sir:

The attached Update Licensee Event Report, 83-020/01X-1, "Missed Surveillance for T.S. 3.11.D and 4.11.D", is hereby submitted in accordance with the requirements of Pilgrim Nuclear Power Station Technical Specification 6.9.B.1.f.

If there are any questions on this subject, please do not hesitate to contact the undersigned.

Very truly yours,

  
William D. Harrington

WDH/mg

Enclosure: Update LER 83-020/01X-1

cc: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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