



BOSTON EDISON

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BECO 91- 113
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LONG TERM PROGRAM: SEMI-ANNUAL REPORT

This letter provides the semi-annual report for the Long Term Program (LTP) in accordance with Section V.A of the "Plan for the Long Term Program - Pilgrim Nuclear Power Station". Attachment 1 includes schedules for the A and B regulatory items. Attachment 2 includes commitment descriptions, progress since the last update, and summaries of changes.

In addition to Schedule A and B items, we are implementing plant betterment modifications and activities. These additional items, identified in Schedule C, are included in Attachment 3. They are outside the regulatory scope of the Long Term Program and are thus exempt from the license conditions imposed on Schedule B items. Schedule C items are combined with Schedule A and B items to derive integrated schedules for all work activities included in the Long Term Program.

During this LTP reporting period we completed our eighth refueling outage. Several issues emerged during the outage resulting in a larger work scope than originally planned. This additional work included:

- Augmented IGSCC Inspection
 - Replacement of approximately one-third of the Reactor Water Cleanup System piping with non-susceptible 6L stainless steel pipe.
- Erosion/Corrosion Inspection
 - Replacement of 700 feet of 6 inch pipe in the Moisture Separator Drain System with erosion/corrosion resistant 1% chromium, 1/2% molybdenum alloy steel pipe.
 - Replacement of 200 feet of 12 inch pipe on extraction steam piping with erosion/corrosion resistant 1% chromium, 1/2% molybdenum alloy steel pipe.
 - Modification of 2 nozzles on extraction steam piping.
 - Replacement of 4 nozzle safe ends on extraction steam piping.
 - Replacement of 2 valve station headers in the Moisture Separator Drain System.

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[Signature]

- Salt Service Water Piping Inspection
 - Replacement of 14 spool pieces.
 - Repair of 5 spool pieces.
- Reactor Water Level Instrumentation
 - Replacement of the reactor water level instrument reference legs with larger diameter piping.

In order to accommodate the resource allocations necessitated by these scope increases, one task in the area of Security, originally planned for completion in 1991 is being postponed until 1992. The details of this task are further explained in Attachment 2 under LTP #029, Physical Security Improvements.

We plan to conduct a mid-cycle outage in 1992 for equipment modifications, maintenance, and surveillances. Presently this outage is projected for March 1992. We are evaluating the merits of shifting the schedule to the fall of 1992 at this time, however, and will notify you if a schedule change results.


G. W. Davis

JDK/clc/6066

Attachments

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PROJECT LTP3 PLOT LTP3 PAGE 1/1 SHEET 1/1	START FINISH 15FEB93 3SEP91	2JAB89	LTP - 5 YEAR PLAN BOSTON EDISON - SCHEDULING DIV.	WORKING SCHEDULE LINE BREAK ON SCHEDULE PRIORITY SDRT BREAKS ICODES 0	MODE C/FE INTERVAL: 1 MONTH(S)	RUN 28AUG93 15:51 PROJECT/2 8845 SCHEDULE BAR CHART						
1991	SOND	JFMAMJJJASON	1992	JFMAMJJJASON	1993	JFMAMJJJASON	1994	JFMAMJJJASON	1995	JFMAMJJJASON	1996	JFMAMJJ
0 MSTP/RFO												
1000000026 MID-CYCLE OUTAGE -- CYCLE #9												
1000000028 RFO #9												
1000000030 MID-CYCLE OUTAGE -- CYCLE #10												
1000000032 RFO #10												
1000000034 MID-CYCLE OUTAGE -- CYCLE #11												
1 SCHEDULE A												
8000000011 10CFR50.67, ATMS FINAL RULE REPLACE ROSEMOUNT TRIP UNITS WITH G.E. TRIP UNITS												
8000000022 STATION PLACKOUT RULE SHUTDOWN BUS EMERGENCY VIA SBO - DIESEL GENERATOR MOD.												
8000000033 MAINTENANCE RULE												
8000000044 10CFR20 STANDARDS FOR PROTECTION AGAINST RADIATION												
SUBMIT ENDS PROGRAM PLAN												
8000000055 EMERGENCY RESPONSE DATA SYSTEM												
DATA DATE 3SEP91												
LEGEND												
REPORTED PROGRESS												
WORKING SCHEDULE												
SCHEDULE BARS												
EVENT												

Attachment 1
Page 1 of 5

0 MSTP/RFO

2 SCHEDULE B

DATA DATE
3 SEP 91

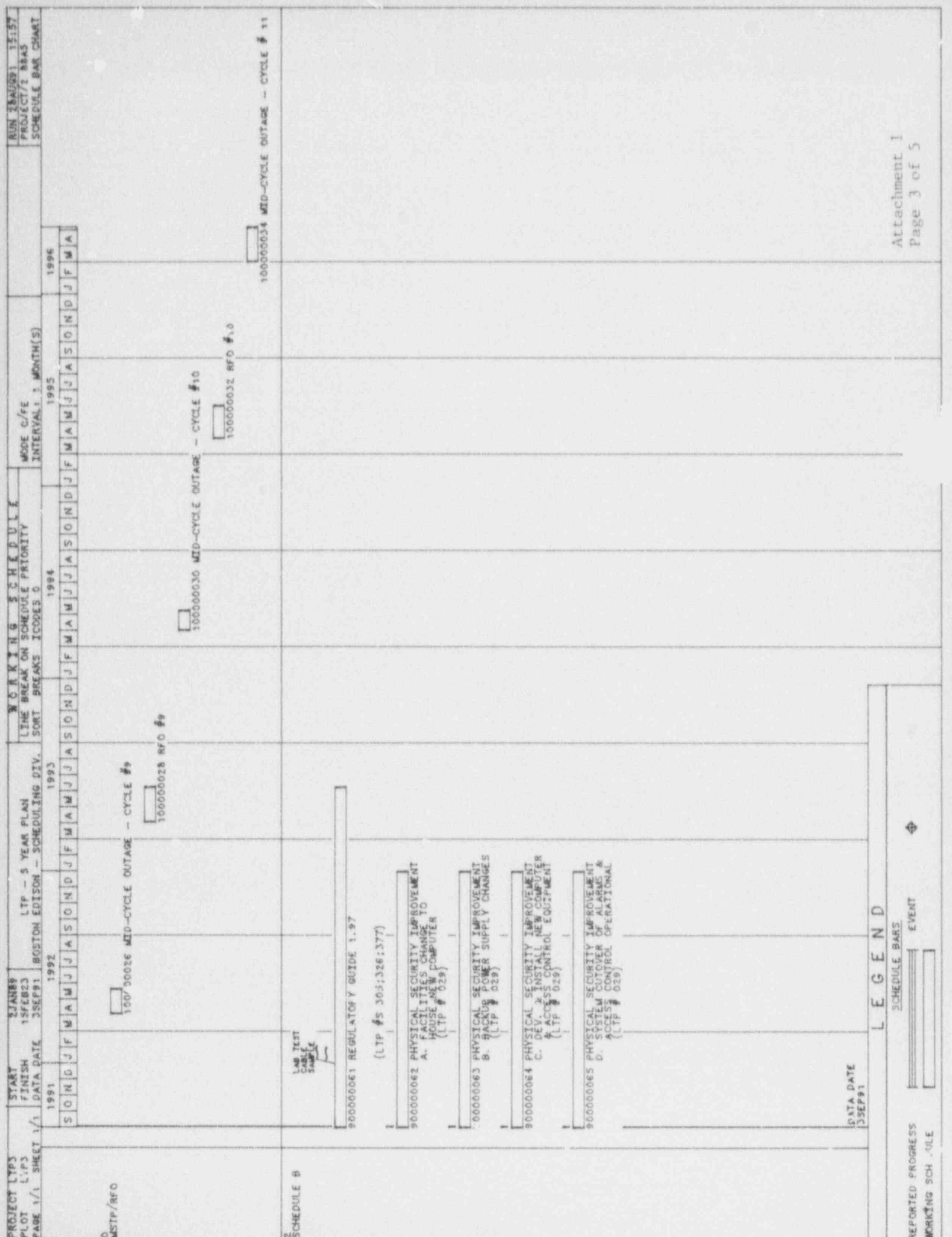
LEGEND

REPORTED PROGRESS

WORKING SCHEDULE

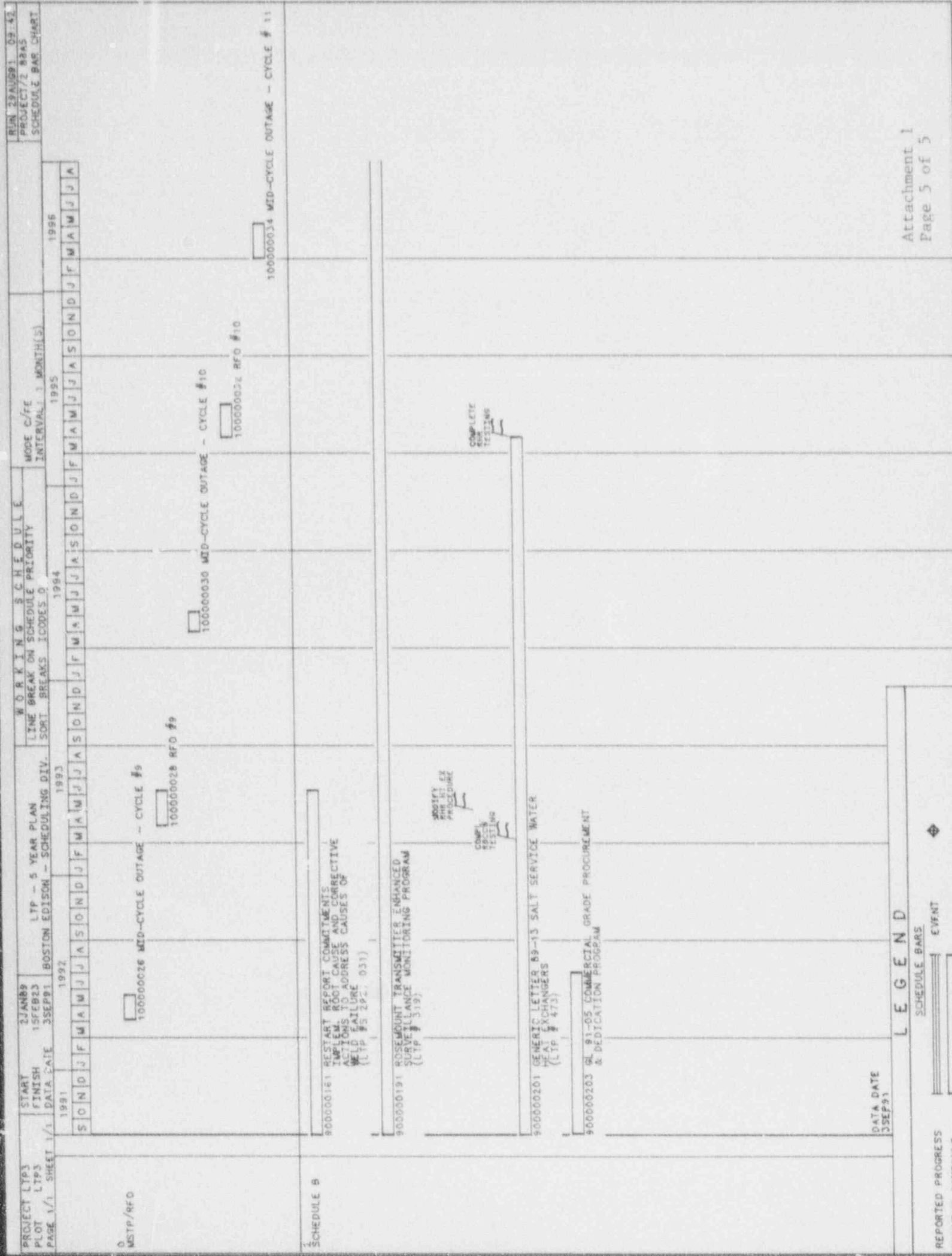
SCHEDULE BARS

EVENT



100000026 MID-CYCLE OUTAGE - CYCLE #9	100000030 MID-CYCLE OUTAGE - CYCLE #10	100000032 REF #10	100000034 MID-CYCLE OUTAGE - CYCLE #11
<p>900000103 GL 89-08 DEVELOP LONG TERM EROSION/CORROSION PROGRAM (LTP # 005)</p> <p>900000111 GL 88-20 SUPPL. 1 IPE (LTP # 483)</p> <p>900000122 GL 83-28 ITEM 2.2 (PAR. 2) PRESENT TECH INFO LIBRARY (LTP # 303)</p> <p>900000134 GL 89-10 MOV TESTING & SURVEILLANCE (LTP # 487)</p>			

Attachment 1
Page 4 of 5



ATTACHMENT 2

SCHEDULE A

ATWS RULE COMPLIANCE

Commitment Description

The ATWS Rule 10CFR50.62, requires modifications to the Standby Liquid Control System, Alternate Rod Insertion and Reactor Recirculation Pump Trip by the second refueling outage from June 26, 1984 (i.e., RFO #8 for BECo).

BECo implemented the Standby Liquid Control System modification in RFO #7. The Technical Specification changes for Standby Liquid Control System were approved by the NRC on August 5, 1987 (Amendment #102). The ARI/RPT modifications were implemented in 1980 in response to NUREG-460, as directed by the NRC.

The NRC requested additional information regarding ARI/RPT modifications by Reference 4 to determine compliance with this rule. BECo submitted its response via Reference 5. The diversity of ARI is yet to be resolved with the BWROG, NRC and licensees, as identified in the meeting notes from the NRC (Reference 6). All other items are resolved. The NRC Safety Evaluation Report issued June 6, 1989 (Reference 7) accepted BECo's design except for diversity. Based on the need for additional time to change from the existing Rosemount trip units and relays, the NRC determined an extension of time to fully comply with the diversity requirements would be acceptable. Another alternative discussed in the SER would be to request an exemption from the diversity requirement. The SER states the NRC staff will provide additional guidance on the diversity issue shortly and requests BECo provide a schedule for resolution when the additional NRC staff guidance is provided. Concurrently, BECo sought to resolve the diversity issue through the BWR Owner's Group.

The NRC has since resolved the diversity issue through issuance of a generic position to the BWROG in Reference 8 that also requested licensees to propose a schedule for achieving compliance with the diversity requirement. This resolution of the diversity issue was made available to us by our NRC Project Manager on October 5, 1990.

BECo has reviewed the staff's position on the diversity requirement, the NRC generic position presented to the BWROG in Reference 8, and the existing diversity afforded by the Pilgrim ARI system (as presented to the NRC staff in a meeting on December 9, 1989). In accordance with the SER (Reference 7), our resolution to the diversity issue includes replacement of Rosemount trip units and an exemption request for actuation relays. Our Reference 9 letter provided the basis for the exemption request and a commitment to replace the Rosemount trip units with General Electric trip units during the mid-cycle outage presently scheduled for March, 1992.

In Reference 10, the NRC approved our proposed resolution of the ATWS/ARI diversity issue.

ATTACHMENT 2 (Continued)

SCHEDULE A

References

- 1) 10CFR50.62
- 2) BECo Ltr. 85-140 dated August 7, 1985
- 3) NRC Ltr. from Mr. H.R. Denton to BWROG Chairman dated August 19, 1985
- 4) NRC Letter dated September 27, 1987
- 5) BECo Letter 88-073, dated April 27, 1988
- 6) NRC Letter to BECo, dated January 9, 1989
- 7) NRC Letter to BECo, dated June 6, 1989
- 8) NRC Letter to BWROG Chairman, dated September 20, 1990
- 9) BECo Letter 91-021, dated February 25, 1991
- 10) NRC Letter to BECo, dated May 7, 1991

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

BECo complies with the rule in all areas except diversity. As stipulated in the NRC SER (Ref. 7)) on this issue, a schedule for resolution of the diversity issue will be developed following receipt of additional NRC guidance, or an exemption request from the diversity requirement will be submitted.

Progress and Summary of Changes - February 1990 to November 1990

Absent the specific NRC guidance, but based on the Reference 8 NRC denial of the BWR Owners Group appeal on diversity, we are presently planning to purchase trip units and relays to address diversity for Pilgrim Station. A separate BECo letter outlining further details and implementation schedules is planned for submittal in the near future.

Progress and Summary of Changes - December 1990 to February 1991

Based on the Reference 9 letter providing our resolution for achieving diversity for Pilgrim Station, we plan to replace Rosemount trip units with General Electric trip units during the mid-cycle outage in 1992. No actions are planned for replacement of actuation relays based on our exemption request, also submitted via Reference 9.

Progress and Summary of Changes - March 1991 to August 1991

In Reference 10, the NRC granted our exemption request for actuation relays and accepted our proposed schedule for replacing Rosemount trip units with General Electric trip units during the 1992 mid-cycle outage. This replacement is on schedule for completion during the 1992 mid-cycle outage.

ATTACHMENT 2 (Continued)

SCHEDULE A

STATION BLACKOUT RULE (SBO)

Commitment Description

The rule required a submittal by April 17, 1989, providing:

- a specified station blackout duration with justifications
- a description of procedures for SBO events and recovering from them
- a list of proposed modifications and schedule including procedures for meeting the SBO duration

BECO responded in Reference 2. A schedule for completion of modifications will be determined and submitted within 30 days following receipt of an NRC notification accepting BECO's proposed design. 10CFR 50.63(c)(4) requires the completion within 2 years of notification by NRC that the proposed design is acceptable or provide an explanation and a justification if the schedule will exceed 2 years.

BECO received the NRC Safety Evaluation Report (Reference 6) on February 25, 1991. An initial response describing SBO-related modifications planned for RFO #8 was submitted on March 26, 1991 via Reference 7.

In Reference 8, we provided an implementation schedule of RFO #9 for the remaining equipment and procedure modifications, and a schedule for resolving the NRC Safety Evaluation Report recommendations based upon NRC's acceptance of our justification for 4 hour SBO duration.

The SBO equipment modifications completed in RFO #8 included the installation of protective relays required to connect to SBO Diesel Generator to the 23KV circuit entering PNPS, to enable load testing of the Alternate AC source during station operation. Additional modifications to enable the operators to energize the shutdown buses with power from the SBO-Diesel Generator within 10 minutes of a SBO event are scheduled for RFO #9. In earlier correspondence, we indicated the modifications would permit the operators to energize the shutdown buses from the Control Room. This may not be necessary to meet the requirement for power from the SBO-Diesel Generator within 10 minutes of a SBO event. The remaining equipment and associated procedure modifications are based upon the previously-described commitments to comply with the Station Blackout Rule by designating Pilgrim's SBO Diesel Generator as the Alternate AC source as defined in 10 CFR 50.2.

In Reference 8, we also supplied additional information supporting our conclusion that Pilgrim should remain in the P2 site characteristic group with a SBO duration of 4 hours. NRC's concurrence was requested by August 1, 1991, so that we could resolve the SER recommendations by December 1991, based upon the 4 hour SBO duration and the 10 CFR 50.2 requirements for an Alternate AC source. The NRC response has not been received. We will provide a revised schedule for resolving the SER recommendations after receipt of the NRC response.

ATTACHMENT 2 (Continued)

SCHEDULE A

References

- 1) 10CFR50.63 (53FR23203, dated June 21, 1988)
- 2) BECo Letter 89-057, dated April 17, 1989
- 3) NUMARC Letter to NUMARC Board of Directors, dated January 4, 1990
- 4) BECo Letter 90-044, dated March 28, 1990
- 5) BECo Letter 90-106, dated August 31, 1990
- 6) NRC Letter dated February 13, 1991
- 7) BECo Letter 91-042, dated March 26, 1991
- 8) BECo Letter 91-074, dated June 3, 1991

Commitment History/Progress

Progress and Summary of Changes - March, 1989 to February 1990

As part of the Safety Enhancement Program, BECo has installed a 3rd diesel to provide emergency power during station blackout (SBO) periods. In compliance with the rule, a letter was transmitted to NRC on April 17, 1989 committing to designate this 3rd diesel as an Alternate AC Source and to implement a series of modifications to enable the starting and loading of the 3rd diesel from the Control Room within 10 minutes of an SBO. These modifications will be scheduled upon receipt of a NRC SER.

The NRC review of BECo's submittal generated several questions that were discussed in a telephone call on December 20, 1989. Since then, the NRC via NUMARC has requested all Licensees to re-confirm the level of conformance to the NUMARC SBO guidelines used by the Industry to develop rule compliance.

10CFR50.63(C)(4) requires the submittal of a schedule for completion of SBO modifications within 30 days of NRC notification that our proposed modifications are acceptable. This submittal must include an explanation of the schedule and a justification if the schedule does not provide completion of the modifications within two years of the notification.

In our April 17, 1989 letter providing the details of our proposed modifications, we projected an RFO #8 completion date in anticipation of receiving an NRC acceptance notification shortly after the April 17, 1989, submittal. This not being the case, we no longer plan to complete these modifications by RFO #8. A schedule for completion will not be available until the receipt of the NRC notification.

Progress and Summary of Changes - February 1990 to November 1990

In response to the Reference 3 NUMARC request, we submitted information to the NRC (Reference 4) describing modifications we intend to make to qualify the 3rd diesel as an alternate AC source as defined in 10CFR50.2. A prompt NRC review and Safety Evaluation Report was again requested in order that completion of the modification could be accomplished by RFO #8.

ATTACHMENT 2 (Continued)

SCHEDULE A

Other applicable supplemental information in response to the NUMARC request was prepared and submitted to the NRC via Reference 5.

Progress and Summary of Changes - December 1990 to February 1991

BECO received the NRC's February 13, 1991 Safety Evaluation on February 25, 1991. We will review the Safety Evaluation and provide an initial response by March 27, 1991 and a detailed schedule by June 1, 1991.

Progress and Summary of Changes - March 1991 to August 1991

An initial response to the Reference 6 NRC Safety Evaluation Report was submitted on March 26, 1991 (Reference 7) describing SBO related modifications planned for RFO #8.

As described in the Reference 7 response, installation of protective relays to allow load testing of the Alternate AC source during station operation were completed during RFO #8.

In Reference 8, we provided an implementation schedule of RFO #9 for the remaining equipment and procedure modifications, and a schedule of December 1991 for resolving the Safety Evaluation Report recommendations. We also supplied additional information supporting our conclusion that Pilgrim should remain in the P2 site characteristic group with a 4 hour SBO duration. NRC's concurrence was requested by August 1, 1991 so that we could resolve the SER recommendations by December 1991, based upon the 4 hour SBO duration and the 10 CFR 50.2 requirements for an alternate AC source. The NRC response has not been received. We will provide a revised schedule for resolving the SER recommendations after receipt of the NRC response.

ATTACHMENT 2 (Continued)

SCHEDULE A

CONTROL ROOM SIMULATOR CERTIFICATION (LTP#s 163, 277, 316, 478)

Commitment Description

10CFR55.45 requires the submittal of an application for simulator certification for facility licensees desiring to conduct operator testing. The simulation facility portion of the operator test cannot be administered on other than a certified or an approved simulation facility after May 26, 1991. Since BECo's simulation facility consists solely of a plant-referenced simulator, per 10CFR55.45(b)(2)(iii) the certification application must be submitted on or before March 26, 1991. The project includes conversion to a dual train computer system.

Reference

- 1) Final Rule 52FR9460, dated March 25, 1987
- 2) NRC Generic Letter 90-08, dated August 10, 1990
- 3) BECo Letter 91-034, dated March 12, 1991

Commitment History/Progress

Progress and Summary of Changes - February 1990 to November 1990

Simulator Certification activities are on schedule for submittal of a certification application on or before March 26, 1991.

This date was previously listed as January 27, 1991 and is being changed to March 26, 1991 which is the correct date for final certification application submittal as clarified in Reference 2.

Progress and Summary of Changes - December 1990 to February 1991

An application for simulator certification is on schedule for submittal by March 26, 1991.

Progress and Summary of Changes - March 1991 to August 1991

The simulator certification application and supporting documentation was transmitted to the NRC on March 12, 1991 (Reference 3). This item is closed.

SCHEDULE A

MAINTENANCE RULE

Commitment Description

10CFR50.65 "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants " was issued as a final rule on July 10, 1991 (Reference 1). Licensees are required to have in place by July 10, 1996, a program capable of monitoring the overall continuing effectiveness of their maintenance programs to ensure that safety related and certain non-safety related structures, systems, and components are capable of performing their intended functions; failures of non-safety related equipment will not occur which could prevent the fulfillment of safety related functions; and failures resulting in scrams and unnecessary actuations of safety related systems are minimized.

The rule has a five year implementation schedule with supporting regulatory guide development and promulgation expected within the first two years. This schedule allows three years for licensee development beyond the time that final guidance is expected to be available.

References

1. Federal Register Vol. 56 No. 132, dated July 10, 1991

Commitment History/Progress

Progress and Summary of Changes - March 1991 to August 1991

A program for ensuring compliance with the maintenance rule is being developed and will be provided in the next regular report for the LTP.

ATTACHMENT 2 (Continued)

SCHEDULE A

10CFR20 STANDARDS FOR PROTECTION AGAINST RADIATION

Commitment Description

In Reference 1, the NRC issued a revision to the 10CFR20 requirements, "Standards for Protection Against Radiation." These revisions became effective on June 20, 1991, and are required to be implemented by January 1, 1993, in their entirety. Licensees have the choice of implementing the new requirements in their entirety prior to January 1, 1993, with notification to the NRC, or continuing with the existing requirements until January 1, 1993, after which they must adopt the new requirements. Implementation of selected portions of the revised rule is not allowed prior to the January 1, 1993 deadline.

The revised rule changes the existing radiation protection requirements and practices, accounting of occupational exposures, maintenance of exposure records, General Employee Training, and Health Physics training. The NRC is also revising certain Regulatory Guides and issuing new Regulatory Guides to provide regulatory positions and guidance for implementing the revised requirements. The NRC expects these Regulatory Guides to be available after October/November, 1991.

References

1. Federal Register Vol. 56 No. 98, dated May 21, 1991

Commitment History/Progress

Progress and Summary of Changes - March 1991 to August 1991

A program is being developed to ensure compliance with the revised requirements within the prescribed implementation schedule and will be provided in the next regular report for the LTP.

ATTACHMENT 2 (Continued)

SCHEDULE A

EMERGENCY RESPONSE DATA SYSTEM

Commitment Description

Per Reference 1, the NRC issued a final rule requiring all operating nuclear power facilities to participate in the Emergency Response Data System (ERDS) program. Participation in the ERDS program entails a direct near real-time electronic data link between the plant's onsite computer system and the NRC Operations Center that provides for the automated transmission of a limited data set of selected parameters during a declaration of an ALERT or higher emergency classification.

An ERDS implementation program plan must be developed and submitted to the NRC by October 28, 1991. Implementation of the ERDS must be complete by February 13, 1993, or before initial escalation to full power, whichever comes later.

References

1. Federal Register Vol. 56, No. 156, dated August 13, 1991.

Commitment History/Program

Progress and Summary of Changes - March 1991 to August 1991

An ERDS implementation program plan will be submitted by October 28, 1991.

ATTACHMENT 2 (Continued)

SCHEDULE B

DETAILED CONTROL ROOM DESIGN REVIEW (G.L. 82-33) (LTP #299, 300, 327, 328, 375)

Commitment Description

References 6, 7, and 8 provided a DCRDR Supplementary Summary Report with update information, panel enhancement program information, and a revised DCRDR program plan, respectively. Reference 9 revised the schedule commitments for enhancements to three control panels singled out by BECo for completion ahead of the others.

A final DCRDR Summary Report, Reference 10, was submitted on November 30, 1990. This summary report included detailed scope and schedules for the remainder of DCRDR issues to be implemented at Pilgrim Station, summarized as follows:

- Complete installation of control room ceiling lighting improvements (LTP 375) by December 31, 1991.
- Complete remaining "Category 7" HEDs (non-engineered actions) by March 31, 1992.
- Complete control panel enhancements (LTP 300 plus portion of LTP 328) by end of RFO 9.
- Complete control panel improvements (balance of LTP 328) by end of RFO 9 (outage portion) and December 31, 1993 (on-line portion).
- Begin installation of replacement annunciator in RFO 9 (completion date to be established)(LTP 327).

References

- 1) NUREG 0737: Item I.D.1
- 2) BECo Letter 84-159, dated September 24, 1984
- 3) NRC Letter 85-157, dated May 16, 1985
- 4) NRC Letter 86-002, dated January 6, 1986
- 5) BECo Letter 87-008, dated January 20, 1987
- 6) RECo Letter 89-064, dated May 2, 1989.
- 7) BECo Letter 89-102, dated July 6, 1989.
- 8) BECo Letter 89-112, dated July 24, 1989.
- 9) BECo Letter 90-008, dated January 11, 1990.
- 10) BECo Letter 90-147, dated November 30, 1990.
- 11) BECo Letter 91-099, dated July 31, 1991.

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

Submit Supplementary Summary Report - Complete

ATTACHMENT 2 (Continued)

SCHEDULE B

Progress and Summary of Changes - February 1990 to November 1990

- The final DCRDR Summary Report was submitted November 30, 1990.
- As a result of ongoing human factors evaluations, the scope of control room panel enhancements has expanded beyond those committed in Ref. 7. The on-line portion is planned to be completed by June 30, 1992; the outage portion is planned for completion by the end of RFO #9. The extent of enhancements to be performed in RFO #8 and those to be performed on a later schedule are detailed in the November 30, 1990 Final DCRDR Summary Report submittal. The next LTP update will reflect the revised scope and schedule of the summary report.
- We have determined improvements to control room lighting can be implemented on line. Therefore, we are revising the previous completion date of the end of RFO #8 to completion by December 31, 1991. We plan to install the lighting improvements on-line before RFO #8. However, in the event they are not completed before RFO #8, we will complete them by December 31, 1991.

Progress and Summary of Changes - December 1990 to February 1991

Currently, work to accomplish the items listed in Reference 10 is on schedule.

Progress and Summary of Changes - March 1991 to August 1991

The following improvements were implemented during RFO #8:

- Installed welded patches to restore all main control panels to uniform flat, flush, smooth surface suitable for painting and for installation of improvements.
- Repainted all control panels in main operating area, and began effort to repaint the "back panels."
- Replaced labels and installed new mimics and demarcations on 10 panels, plus revisions to mimics and labels on additional panels.
- Completed removal of abandoned equipment from Main Control Panels.
- Replaced approximately 325 switch escutcheons and 200 switch handles.
- Rewired or replaced 17 switches, continuing a program to achieve uniform switch positions and patterns.
- Rearranged 3 groups of switches and 3 groups of indicators to achieve more logical arrangement.
- Installed an additional set of scram and MSIV indicators on Panel C905.

ATTACHMENT 2 (Continued)

SCHEDULE B

- Replaced 6 meter scales with scales improved in readability; more to be installed on-line, after RFO #8.

In Reference 11, we notified the NRC that we will not be implementing switch rearrangements for the Safety Relief Valves. The work to accomplish the remaining Reference 10 items is on schedule.

SCHEDULE BREGULATORY GUIDE 1.97 (G. L. 82-33) (LTP #305, 326, 377)Commitment Description

Generic Letter 82-33 required each licensee to review the accident monitoring instrumentation available at their facility and to compare this instrumentation with the recommendations of Regulatory Guide 1.97. The results of BECo's review and comparison for PNPS was provided by Reference 2, with a projected project completion schedule by RFO #8.

A summary of compliance submitted to the NRC in Reference 8 restated compliance information previously submitted, provided new information for specific variables, and identified open items requiring additional work by BECo. Based on the extent of open items for this project, the project completion schedule was changed to RFO #9. This revised project completion schedule was contingent upon NRC approval of both our summary of compliance and the BWR Owner's Group position on neutron flux monitoring capability.

In the February 28, 1991 LTP Update, we rescinded the schedule for completion of the project because we had not then received NRC approval of our summary of compliance.

The NRC safety evaluation report (Reference 11) has since been received. Although this safety evaluation report is not complete, the remaining open or unreviewed issues are expected to be resolved in time to support project completion by RFO #9. Therefore, the schedule for project completion by the end of RFO #9 is reinstated.

Project completion by RFO #9 is based upon expected NRC acceptance of the BWR Owners' Group appeal on neutron flux monitoring capability. If the NRC does not accept this appeal, addressing this issue at PNPS will require a revised project completion schedule.

References

- 1) NRC Generic Letter 82-33, dated December 17, 1982
- 2) BECo Letter 84-187, dated November 1, 1984
- 3) NRC Letter 85-372, dated December 12, 1985
- 4) BECo Letter 87-021, dated February 10, 1987
- 5) NRC Letter 89-044, dated January 24, 1989
- 6) BECo Letter 89-053, dated April 11, 1989
- 7) BECo Letter 90-005, dated January 11, 1990
- 8) BECo Letter 90-010, dated January 15, 1990
- 9) BECo Letter 90-049, dated April 5, 1990
- 10) BWROG Letter to NRC, BWROG-90107, dated August 20, 1990
- 11) NRC Letter 91-070, dated March 13, 1991
- 12) BECo Letter 91-040, dated March 20, 1991
- 13) BECo Letter 91-066, dated May 13, 1991

ATTACHMENT 2 (Continued)

SCHEDULE B

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

Schedule revised.

BECO responded to the NRC request for additional information (Reference 5) on April 11, 1989 and supplied the information for instrumentation monitoring effluent radioactivity and status of standby power on January 11, 1990. In addition, a summary of compliance with updated information for specific variables and open items requiring additional work was provided on January 15, 1990. We are presently awaiting NRC disposition of remaining open issues.

Based on the scope of open items identified in our recent summary of compliance submittal, dated January 15, 1990, and the re-allocation of BECO resources to accommodate the prioritization of the other LTP issues, the project completion schedule is revised from RFO #8 to RFO #9. This revised project completion schedule is subject to change based on the NRC's review of both our summary of compliance and the BWR Owners' Group position on neutron flux monitoring capability.

Progress and Summary of Changes - March 1990 to November 1990

In anticipation of the NRC's issuance of a safety evaluation report for Regulatory Guide 1.97 compliance at PNPS, BECO provided an updated summary of compliance to the NRC on April 5, 1990 (Reference 9). This update provided the results of our seismic verification program for Regulatory Guide 1.97 Category 1 for primary containment isolation valve indication and seismic Category 2 equipment at PNPS, and provided new information on certain compliance details and exceptions. The BWR Owners' Group submitted a request to the NRC (Reference 10) to appeal the requirement for a post-accident neutron monitoring system that complies with Regulatory Guide 1.97. The Regulatory Guide 1.97 project scope will accommodate the results of the NRC's decision on this appeal. If the appeal is rejected, the addition of work to procure and install a post-accident neutron monitoring system at PNPS will require a revised project completion schedule.

Progress and Summary of Changes - December 1990 to February 1991

During RFO #8, additional safety-related power supplies will be installed for containment isolation valve position switches on the radwaste collection and drywell equipment sumps. A testing and analysis program to provide the basis for Environmental Qualification of Regulatory Guide 1.97 equipment at Pilgrim is in progress. Additional samples of cable will be obtained early in 1991 for testing and evaluation. Laboratory testing of cable and other components is being conducted at Wyle Laboratories. This testing program will be completed in 1991.

Additional actions will be planned and scheduled after receipt of NRC response to the Reference 9 submittal.

ATTACHMENT 2 (Continued)

SCHEDULE B

Progress and Summary of Changes - March 1991 to August 1991

On March 13, 1991, the NRC issued a safety evaluation report (SER) of our conformance to Regulatory Guide 1.97 (Reference 11). This SER found the majority of our identified deviations from full compliance to be acceptable, with exceptions for certain aspects of redundancy and separation, electrical interfaces, channel availability, quality assurance, and servicing, testing, and calibration. In addition, several of our deviations identified in References 9 and 12 have not yet been reviewed by the NRC in this SER.

Concurrent with the receipt of the NRC SER, we submitted an update of our summary of compliance (Reference 12). This update provided additional information on our compliance with design and qualification criteria and the status of standby power and other energy sources important to safety. In addition, this update included a new deviation concerning the monitoring of noble gases and vent flow rates through the main stack.

We responded to the NRC SER with an additional update to our summary of compliance dated May 13, 1991 (Reference 13). This update provided the requested commitment to provide the redundancy and separation recommended by Regulatory Guides 1.97 and 1.75 for those portions of instrumentation being upgraded to conform with Category 1 criteria. Other changes to our summary of compliance were included to address the other open issues in the NRC SER, with the exception of electrical interfaces. In a telephone conversation on April 29, 1991, we discussed this open issue with the NRC and their reviewer. The NRC stated the design at PNPS appeared to be acceptable for a plant of our vintage, but they requested a formal submittal to support this possible conclusion. Additional information on the electrical isolation design at PNPS will be submitted to the NRC to support further NRC review of the acceptability of our current design.

During RFO #8, additional safety-related power supplies were installed for containment isolation valve position switches on the radwaste collection and drywell equipment sumps. This modification completes the actions required for LTP Item 301.

The samples of electrical cable needed to complete the testing and analysis program for environmental qualification have been obtained. The laboratory testing of these cable samples and other components is still underway at Wyle Laboratories. The testing portion of this program is still expected to be completed in 1991.

With the receipt of the NRC SER, the schedule for project completion by the end of RFO #9 is reinstated. Although this SER is not complete, the remaining open or unreviewed issues are expected to be resolved in time to support project completion by RFO #9. This schedule is based upon the expected NRC acceptance of the BWR Owners' Group appeal on neutron flux monitoring capability. If the NRC does not accept this appeal, addressing this issue at PNPS will require a revised project completion schedule.

SCHEDULE BSEISMIC VERIFICATION PROGRAM (G. L. 87-02)Commitment Description

As a member of the Seismic Qualification Utility Group (SQUG), BECo plans to implement the seismic verification program at PNPS through the Generic Implementation Procedure (GIP) developed by SQUG. Reference 2 provided an initial series of activities planned to occur during Operating Cycle 8 in 1989 and 1990. These activities were to: develop a safe shutdown equipment list; locate, assemble, and/or recreate original design basis seismic documentation for the above-identified equipment; provide training for our walkdown team members; and commence the walkdown in accessible areas. The schedule for completion of these activities was revised via our February 20, 1990 LTP update, to Operating Cycle 9 in 1991 and 1992. However, as stipulated in our Reference 2 submittal, the successful completion of these activities within these time frames depended largely upon the SQUG/NRC disposition of the SER open issues. Since these issues have not been resolved to date, we will reforecast the schedule for completion. The revised schedule for these activities and for final completion of the seismic verification program will be developed further in concert with the continuing NRC review and resolution of the remaining GIP open issues and submitted in a later LTP update.

References

- 1) NRC Letter 87-078, Generic Letter 87-02, dated February 19, 1987
- 2) BECo Letter 88-145, dated October 11, 1988
- 3) NRC Letter 89-223, dated June 7, 1989

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

- A. Develop safe shutdown equipment list - Schedule Revised
- B. Recreate original seismic design basis documentation - Schedule Revised
- C. Training and commence walkdown of accessible areas - Schedule Revised

The schedule for performing these three items was revised from Cycle 8 to Cycle 9 as a result of our re-assessment of the work to be performed for this seismic issue, with respect to the generic work scope for other similar existing and emerging seismic issues. By incorporating the similarities of work scope for each of the below listed issues into one set of physical activities, we can best optimize our resources. Other seismic issues include:

- Seismic Design Basis (USI A-40)
- Eastern Seismicity and Seismic Design Margins
- External Events (seismic) for Individual Plant Examinations

ATTACHMENT 2 (Continued)

SCHEDULE B

Progress and Summary of Changes - February 1990 to November 1990

A revised schedule for implementation of the seismic verification program will be developed after issuance of the NRC SER resolving the GIP open issues.

Progress and Summary of Changes - December 1990 to February 1991

No changes from the previous report period.

Progress and Summary of Changes - March 1991 to August 1991

A schedule for implementation of the seismic verification program will be developed after issuance of the NRC SER resolving the GIP open issues.

SCHEDULE B

PHYSICAL SECURITY IMPROVEMENTS (LTP #029)

Commitment Description

In response to NRC inspection findings, and as a plant betterment activity, BECo committed to replace the security computer and improve certain security activities. This includes miscellaneous perimeter improvements (completed in December 1989), installation of new security computer facilities, a new security computer and access control system, and a backup power supply.

References

- 1) NRC Letter 85-119, dated April 30, 1985 (RER Report)
- 2) I&E Inspection Report 86-08 dated 5/29/86

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

- A. Misc. perimeter improvements - Complete
- B. Facilities change to house new computer - On Schedule for completion by December 31, 1990.
- C. Backup power supply changes - Schedule revised
- D. Develop & install new computer & access control equipment - On Schedule for completion by December 31, 1991.

The schedule for backup power supply completion was revised from December 1990 to June 1991. This change was made to properly reflect the actual integration of this activity with respect to the remaining security improvement activities.

Progress and Summary of Changes - February 1990 to November 1990

- Facilities change to house new computer - Schedule revised from December 31, 1990 to December 31, 1991.
- Backup power supply changes - Schedule revised from June 1991 to December 31, 1991.
- Develop & install new computer and access control equipment - On schedule for completion by December 31, 1991.
- System cutover of alarms and access control will be in full operation by June 30, 1992.

These changes in schedule are the result of unanticipated delays encountered during construction such as the procurement of materials to relocate existing fire water lines, removal of asbestos during building demolition, and contaminated material handling.

ATTACHMENT 2 (Continued)

SCHEDULE B

Progress and Summary of Changes - December 1990 to February 1991

Based on improvements undertaken to address NRC evaluations of our security perimeter conducted in 1990, and recent events in the Persian Gulf, we have re-focused our efforts involving physical security improvements to include additional work activities aimed at strengthening perimeter security. These additional activities will be completed in 1991 and include:

- Upgrading the E-Field to a Series 5000
- Installing a new Video Capture System
- Enhancing site lighting

The integration of these activities with the present LTP activities necessitate changes to the projected completion dates. Progress summary and schedule changes are as follows:

- Construction has begun on a new facility to house the new security system computer. Renovations to the bottom floor of the Main Gate House have also begun. This is part of the revised security facilities scope. This work will continue through 1992; thus, the completion date is changed from December 31, 1991 to December 31, 1992.
- A new backup power supply (diesel generator) has been ordered, and expected delivery is March 1991. Final completion of installation is revised to December 31, 1992 to coincide with the computer facilities upgrade schedule.
- Performance acceptance testing of the new security computer system at the manufacturer's facilities has identified system problems that have delayed delivery. Delivery is anticipated within the next several months; therefore, staging and commencement of training and security operating procedure revisions are planned for 1991. The final completion date for the computer and access control equipment is changed to December 31, 1992.
- The system cutover of alarms and access control operational completion date is similarly revised to December 31, 1992 to accommodate the above schedule revisions.

Progress and Summary of Changes - March 1991 to August 1991

- Construction of a new facility to house the new security system computer is on schedule for completion by December 31, 1992.
- The new backup power supply (diesel generator) was received on July 19, 1991. Installation is on schedule for completion by December 31, 1992.

ATTACHMENT 2 (Continued)

SCHEDULE B

- Delivery of the new security computer system has been delayed and is not anticipated until early 1992. The final completion date of the computer and access control equipment is on schedule for December 31, 1992.
- System cutover of alarms and access control operational is on schedule for completion by December 31, 1992.
- We are shifting the implementation schedule from 1991 to 1992 for upgrading the E-Field to a Series 5000. This revision is based on resource re-allocations for 1991 necessitated by work scope increases on other non-security tasks during RFO #8. The installation of a new Video Capture System and enhancement of site lighting remain on schedule for completion during 1991.

ATTACHMENT 2 (Continued)

SCHEDULE B

BULLETIN 87-01, THINNING OF PIPE WALLS & GENERIC LETTER 89-08 EROSION/CORROSION INDUCED PIPE THINNING (LTP #005)

Commitment Description

In response to Bulletin 87-01, BECo (Reference 1) committed to develop criteria for determining how frequently to make thickness measurements and develop a database for monitoring erosion/corrosion. As a result of the issuance of Generic Letter 89-08 (Reference 2) and BECo's response (Reference 3), we committed to develop a formal procedure for implementation of a long-term erosion/corrosion monitoring program based on the guidelines developed by NUPRC and to conduct initial inspections during RFO #8. In Reference 4, the NRC confirmed the acceptability and schedule of BECo's planned action, to be taken in response to Generic Letter 89-08.

In the development of the program, we decided to implement a specification for use during RFO #8 defining the criteria for determining frequency of thickness measurements, the erosion/corrosion data base, and the locations and frequencies of inspections.

Development of a formal long-term erosion/corrosion monitoring program remains as an activity and will be completed by February 28, 1992.

References

- 1) BECo Letter 87-159, dated October 2, 1987
- 2) NRC Generic Letter 89-08, dated May 2, 1989
- 3) BECo Letter 89-107, dated July 21, 1989
- 4) NRC Letter, dated April 30, 1990

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

The Bulletin 87-01 scope of work has been revised to incorporate the additional NRC guidance provided in Generic Letter 89-08, "Erosion/Corrosion Induced Pipe Thinning". Our Generic Letter response commitment to develop an erosion/corrosion monitoring procedure by October 31, 1990 was based on the need to complete the procedure development prior to conducting the physical inspections during the next refueling outage. Due to unforeseen emergent issues regarding the Salt Service Water System and the allocation of resources needed to address the issues, the schedule was revised for completion to December 31, 1990. This change does not affect the ability to conduct inspections planned for RFO #8.

Progress and Summary of Changes - February 1990 to November 1990

- A. Develop criteria and data base for long-term erosion/corrosion monitoring is on schedule for completion by December 31, 1990.
- B. Conduct initial inspections is on schedule for RFO #8.

ATTACHMENT 2 (Continued)

SCHEDULE B

Progress and Summary of Changes - December 1990 to February 1991

- A. Develop criteria and data base for long-term erosion/corrosion monitoring is complete.
- B. Conduct initial inspections is on schedule for RFO #8.

Progress and Summary of Changes - March 1991 to August 1991

Initial inspections were conducted during RFO #8. The Erosion/Corrosion inspection requirements related to RFO #8 were defined in Specification M-577. The specification identified 29 locations to be inspected via UT examination. The piping locations selected for initial inspection during RFO #8 constitute an estimated sampling (approximately 10% of the population) of the most highly susceptible areas of the following four plant systems.

1. Extraction Steam Piping - 8 Inspection Points
2. Moisture Separator Piping - 8 Inspection Points
3. Feed Water Piping - 2 Inspection Points
4. Heater Drains and Vents - 11 Inspection Points

Prior to RFO #8 two leaks were identified and temporarily repaired on the Extraction Steam and Moisture Separator systems.

The results of the RFO #8 E/C inspections were as follows:

1. Extraction Steam Piping - 8 original inspection points resulted in 1 failure, 4 additional points inspected resulting in 3 failures.
2. Moisture Separator Piping - 8 original inspection points resulted in 3 failures.
3. Feed Water Piping - 2 original inspection points resulted in no failures.
4. Heater Drains and Vents - 11 original inspection points resulted in no failures.

Based on an evaluation of the inspections that failed the acceptance criteria (several locations at or below minimum wall requirements) and considering that 2 through wall leaks existed prior to RFO #8, it was determined that large scale piping replacement with a material less susceptible to Erosion/Corrosion was the most effective option. The replacement material chosen was 1% chromium, 1/2% molybdenum, alloy steel pipe.

The scope of the work completed during RFO #8 included the following plant modifications:

- Replacement of 200 feet of 12 inch pipe and insulation on the 8th Stage Extraction Steam System in the condenser bay.

ATTACHMENT 2 (Continued)

SCHEDULE B

- Replacement/modification of 2 feedwater heater nozzles (E104A/B) on the 8th Stage Extraction Steam System in the condenser bay.
- Replacement of 2 turbine nozzles safe ends on the 11th Stage Extraction Steam System inside the 'B' condenser.
- The temporary modification of 2 turbine nozzles safe ends on the 11th Stage Extraction Steam System inside the 'A' condenser.
- The replacement of 700 feet of 6 inch pipe and insulation on the Moisture Separator Drain System in the condenser bay.
- The replacement of 2 valve station headers on the Moisture Separator System; the post weld heat treating of over 100 welds and the restoration of all associated pipe supports and check valves.

The above results will be factored into the development of our long term erosion/corrosion program, presently scheduled for completion by February 28, 1992.

SCHEDULE B

GENERIC LETTER 88-20, SUPPLEMENT 1, INDIVIDUAL PLANT EXAMINATION OF SEVERE ACCIDENT VULNERABILITIES (LTP #488)

Commitment Description

In response to GL 88-20 (Ref. 1) and its Supplement 1 (Ref. 2), BECo provided a program plan for completing an Individual Plant Examination (IPE) for severe accident vulnerabilities for Pilgrim Station (Ref. 3). The schedule for completion was deferred to the February 1990 LTP update.

The NRC confirmed the acceptability of our program plan and requested we identify the milestones and schedule for completing the IPE and submitting the results (Ref. 4).

Our schedule for completing the IPE as originally proposed in the February 1990 LTP update was October 1, 1991, with the results to be submitted by December 15, 1991. This schedule was revised in our December 1990 LTP update to completion and submittal by April 30, 1992. Significant milestones include:

- Initiating Event Data Review
- Preliminary Event Tree Development
- Fault Tree Development & Quantification
- Event Tree Quantification
- Containment Event Tree Development & Quantification

References

- 1) Generic Letter 88-20, dated November 23, 1988
- 2) Generic Letter 88-20, Supplement #1, dated August 29, 1989
- 3) BECo Letter 89-159, dated October 27, 1989
- 4) NRC Letter 90-006, dated January 10, 1990
- 5) NRC Letter 88-20, Supplement #2, dated April 4, 1990

Commitment History/Progress

Progress and Summary of Changes - February 1990 to November 1990

Our Schedule for IPE is being revised from completion by October 1, 1991 and submittal by December 15, 1991 to completion and submittal by April 30, 1992.

These changes in schedule are being made to accommodate the involvement of additional BECo personnel in the development and quantification of the IPE which is consistent with the Generic Letter 88-20 guidance.

ATTACHMENT 2 (Continued)

SCHEDULE B

Progress and Summary of Changes - December 1990 to February 1991

IPE is on schedule for completion and submittal to NRC by April 30, 1992.

Progress and Summary of Changes - March 1991 to August 1991

IPE is on schedule for completion and submittal to NRC by April 30, 1992.

SCHEDULE B

GENERIC LETTER 83-28, ITEM 2.2 (PART 2) VENDOR INTERFACE (PROGRAMS FOR ALL OTHER SAFETY RELATED COMPONENTS) (LTP #303)

Commitment Description

In response to Reference 1, BECo committed (Ref. 3) to complete an evaluation of existing vendor interface activities and identify recommendations for improvement. This was accomplished as of August 28, 1989. As a result of this evaluation, BECo is: (1) enhancing formal and informal vendor interface elements and, (2) implementing a new and more comprehensive Plant Equipment Technical Information Library. Our schedule for completion is projected as December 31, 1992.

Generic Letter 90-03 (References 4 & 5) clarified the elements of an equipment manufacturer interface program and requested licensees to review and modify, if necessary, their present equipment manufacturer interface program. Written confirmation of actions taken or planned to be taken was required.

Our Reference 6 response confirmed that the elements of the equipment manufacturer interface program prescribed in Generic Letter 90-03 are included in the existing scope of our Vendor Equipment Technical Information Program (VETIP).

This project involves the establishment of an enhanced vendor interface program that includes: a) All SR components within the NSSS scope of supply, and b) Other key SR components not included in a). The program related to a) will provide for and ensure the receipt of all updates to instruction and maintenance manuals, technical information bulletins, revised test procedures, and updated replacement parts information. The program related to b) is intended to be a good faith, documented effort to periodically contact the vendors of other key, SR components (such as batteries, cooling water pumps, valve operators, diesel generators, SR electrical switchgear) and obtain any technical information applicable to this equipment. The Project Plan and revised administrative procedures, are patterned after INPO Good Practice DE-102 in order to meet these requirements.

Based on the scope, schedule and resource estimates provided in the current revision of the Project Plan, we expect that when completed, the Equipment Technical Information Library will consist of approximately 250 SR/NSSS manuals (plus up to 450 NSR manuals) comprising over 4500 technical bulletins.

We expect to complete at least the total scope of Safety Related and Nuclear Steam Supply System manuals over the next two years.

References

- 1) NRC RAI dated May 4, 1988
- 2) NRC SER dated July 18, 1988
- 3) BECo Letter 88-140, dated September 28, 1988
- 4) NRC Generic Letter 90-03, dated March 20, 1990
- 5) NRC Generic Letter 90-03, Supplement 1, dated May 14, 1990
- 6) BECo letter 90-115, dated October 1, 1990

ATTACHMENT 2 (Continued)

SCHEDULE B

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

The Equipment Technical Information Program is on schedule for completion by December 31, 1991.

Progress and Summary of Changes - February 1990 to November 1990

The Equipment Technical Information Program completion schedule is being revised from December 31, 1991 to December 31, 1992.

This revised schedule is based on our most current review of resource availability and the relative priority of this project to other projects planned during 1991 and 1992.

To date the project has reviewed approximately 120 manuals and catalogued/indexed over 4500 technical bulletins that comprise the current library of approximately 800 manuals (safety related, non-safety related, and Nuclear Steam Supply System). We expect to complete at least the total scope of safety-related and Nuclear Steam Supply System manuals (600) over the next two years.

Progress and Summary of Changes - December 1990 to February 1991

The Equipment Technical Information Program is on schedule for completion by December 31, 1992.

Progress and Summary of Changes - March 1991 to August 1991

The safety-related and Nuclear Steam Supply System scope of the Equipment Technical Information Program is on schedule for completion by December 31, 1992. The number of manuals in this category is approximately 250. The 600 manuals as discussed above in the November 1990 Summary of Changes, was based on a total of approximately 1700 manuals expected to be developed. Although the volume of information will remain the same, the number of total manuals will be limited to approximately 750. Of the 750 manuals, approximately 250 will comprise the safety-related and Nuclear Steam Supply System manuals.

SCHEDULE B

GENERIC LETTER 88-11, NRC POSITION ON RADIATION EMBRITTLEMENT OF REACTOR VESSEL MATERIALS AND ITS IMPACT ON PLANT OPERATIONS

Commitment Description

Generic Letter 88-11 stated that Regulatory Guide 1.99, Revision 2, "Radiation Embrittlement of Reactor Vessel Materials," will be used by the NRC in the review of any licensee submittals regarding reactor vessel pressure-temperature limits.

BECO plans to submit a proposed license amendment to extend the current Technical Specification reactor vessel pressure-temperature limits beyond 10 effective full power years (EFPY). This proposed license amendment will be submitted to the NRC by June 30, 1991 and will be developed using the guidelines of Regulatory Guide 1.99, Revision 2.

References

- 1) Generic Letter 88-11, dated July 12, 1988
- 2) BECO Letter 88-165, dated December 2, 1988
- 3) NRC Letter 89-386, dated November 13, 1989.
- 4) BECO Letter 91-076, dated June 11, 1991

Commitment History/Progress

Progress and Summary of Changes - February 1990 to November 1990

The Technical Specification change is on schedule for submittal four months prior to the end of Cycle 8.

Progress and Summary of Changes - December 1990 to February 1991

The schedule for submittal of this technical specification change is being revised from submittal four months prior to the end of Cycle 8 to submittal by June 30, 1991.

This change is made to accommodate a self-identified need for additional background information regarding the planned application of the generic R.G. 1.99 Revision 2 data to Pilgrim Station. This change will not impact plant operation, as the present pressure/temperature limits apply until 10 EFPY which occurs mid-1992.

Progress and Summary of Changes - March 1991 to August 1991

The amendment request to revise the reactor vessel pressure-temperature limits beyond 10 effective full power years was submitted on June 11, 1991 (Reference 4). This item is closed.

SCHEDULE BGENERIC LETTER 89-04, INSERVICE TESTING PROGRAM (LTP #518)Commitment Description

In response to Generic Letter 89-04, BECo committed (Ref. 2) to revise and develop a series of pump and valve testing procedures for implementation of an Inservice Testing (IST) Program that conforms to the guidance in the generic letter. Reference 3 provided our revised IST Program and Statement of Conformance with the positions stated in the Generic Letter, including relief requests created because of the increased scope of components (pumps and valves) being tested.

On August 6, 1990, a meeting with BECo and the NRC took place to discuss the relief requests. The results of this meeting (Reference 4) concluded that BECo will re-structure the basis for relief on several relief requests, provide additional cross-referencing of material, and re-submit these changes. BECo transmitted a revised Inservice Testing Program (Reference 5) accordingly.

In the Reference 6 SER, the NRC approved our IST program with the exception of one relief request, eight relief requests granted conditionally, and five relief requests granted on an interim basis. Programmatic and procedure revisions will be performed as necessary to assure compliance with the conditional and interim relief granted.

References

- 1) Generic Letter 89-04, dated April 3, 1989
- 2) BECo Letter 89-158, dated October 27, 1989
- 3) BECo Letter 90-001, dated January 4, 1990
- 4) NRC Letter to BECo, dated August 17, 1990
- 5) BECo Letter 90-127, dated October 25, 1990
- 6) NRC Letter 91-111, dated April 22, 1991

Commitment History/ProgressProgress and Summary of Changes - February 1990 to November 1990

The schedule for completion of the last series of procedure changes/development, valve leakage and refueling outage procedures is being revised from RFO #8 minus 60 days (February 28, 1991) to March 30, 1991. New procedure changes required by the IST Program Revision 1 Submittal (reference 5) will be completed within 2 months of BECo receipt of approval of the program.

The schedule revision is the result of the evolving dynamics associated with the BECo/NRC reviews, discussions, and re-submittals as referenced above.

Progress and Summary of Changes - December 1990 to February 1991

The NRC project manager notified BECo in January 1991 the SER for our IST program would be delayed until mid-April, 1991.

The last series of procedure changes/development is on schedule for completion by March 30, 1991.

SCHEDULE B

Progress and Summary of Changes - March 1991 to August 1991

The last series of procedure changes/development was completed by March 30, 1991.

The Reference 6 issuance of the NRC SER for Pilgrim's IST program on April 22, 1991 closes this item. Modifications and testing required to qualify for the granted relief requests were completed in RFO #8. Additional procedures will be revised in accordance with the SER and our IST program submittal for the next 10-year interval will incorporate the provisions outlined for the approved interim relief.

SCHEDULE BGENERIC LETTER 89-10, SAFETY-RELATED MOV TESTING AND SURVEILLANCE (LTP #487)Commitment Description

Generic Letter 89-10 (Ref. 1) expands the scope of the motor operated valve program required by NRC Bulletin 85-03 and its Supplement, to include additional testing, inspecting, and maintenance for all safety-related motor operated valves.

In our Reference 2 response to the Generic Letter, we committed to develop a program to enhance the maintenance, analysis, and testing already being conducted on MOVs at Pilgrim. The Generic Letter calls for the development of this program within 1 year or one refueling outage from the date of the letter, whichever is later. For BECo, this schedule translates to RFO #8. Our plan was to begin a design basis review of MOVs in the first quarter of 1991 and to begin testing in RFO #9. Based on resource constraints in 1990, we revised the design basis review schedule to commence in the last quarter of 1991. This revision continues to support our commitment to begin testing in RFO #9 and supports our program development schedule. We anticipate the testing will require three refueling outages, based on the extent of known scope. Additional scope determinations as a result of NUMARC and BWROG involvement will be factored into our final scope and schedule as appropriate.

Reference 6 requested Licensees to perform a plant specific safety assessment to determine if generic safety assessments performed by the NRC staff and the BWR Owners' Group are applicable. If MOVs are discovered with potential deficiencies of greater significance than the HPCI, RCIC, and RWCU MOVs, planned activities to address the generic letter were to be re-prioritized accordingly. Notification within 30 days of receipt of Supplement 3 was required verifying a plant-specific safety assessment was performed and identifying whether there were MOVs with deficiencies of greater safety significance than in the HPCI, RCIC, and RWCU systems. An additional notification within 120 days of receipt was also requested to provide the criteria reflecting operating experience and the latest test data applied in determining whether deficiencies exist in the HPCI, RCIC, and RWCU MOVs.

In our Reference 7 letter, we concluded the subject valves in the HPCI, RCIC, and RWCU systems were capable of performing their safety function to provide containment isolation in the event of a line break outside containment. This submittal provided our 30 and 120 day response to the generic letter and precluded having to perform a plant specific safety assessment. We also committed in Reference 7 to conduct diagnostic testing on the Reactor Water Cleanup (RWCU) MO-1201-2 valve during RFO #8. We expanded our planned RFO #8 testing to include 2 additional valves: RWCU MO-1201-5 and Closed Cooling Water MO-4010 A.

The NRC issued a Request for Additional Information (RAI) (Reference 10) after reviewing our Reference 7 and 8 responses to GL 89-10 Supplement 3. A response to the RAI is planned for August 31, 1991.

SCHEDULE BReferences

- 1) Generic Letter 89-10, dated June 28, 1989
- 2) BECo Letter 90-13, dated January 15, 1990
- 3) NRC Letter dated June 7, 1990, Response to Generic Letter 89-10
- 4) NRC Letter dated June 13, 1990, Supplement 1 to Generic Letter 89-10
- 5) NRC Letter dated August 3, 1990, Supplement 2 to Generic Letter 89-10
- 6) NRC Letter dated October 25, 1990, Supplement 3 to Generic Letter 89-10
- 7) BECo letter 90-158 dated December 17, 1990
- 8) BECo Letter 91-022, dated February 26, 1991
- 9) NRC Letter dated April 1, 1991, Meeting Summary BECo/NRC
- 10) NRC Letter dated June 24, 1991, RAI regarding GL 89-10 Supplement 3

Commitment History/Progress

Progress and Summary of Changes - February 1990 to November 1990

- Begin a design basis review of MOVs is on schedule for first quarter of 1991.
- Begin testing is on schedule for RFO #9 (completion within 3 refueling outages).
- 30 day notification in accordance with Generic Letter 89-10, Supplement 3 is planned for submittal by December 13, 1990.
- 120 day notification efforts are planned for submittal by March 13, 1991.

Progress and Summary of Changes - December 1990 to February 1991

- The schedule for commencement of design basis reviews of MOVs is being changed from the first quarter of 1991 to the last quarter of 1991. This schedule revision continues to support our commitment to begin testing in RFO #9.
- Begin testing is on schedule for RFO #9 (completion within 3 refueling outages).
- 30 day and 120 day notifications are complete.
- 3 safety related valves are on schedule for diagnostic testing during RFO #8 (MO-1201-2, 1201-5, and 4010A).
- Development of a Program Plan is on schedule for completion by May 1, 1991.

Progress and Summary of Changes - March 1991 to August 1991

- Commencement of design basis reviews of MOVs is on schedule for the last quarter of 1991.
- Begin testing is on schedule for RFO #9 (completion within 3 refueling outages).

ATTACHMENT 2 (Continued)

SCHEDULE B

- Diagnostic testing of MO-1201-2, 1201-5, and 401JA was conducted during RFO #8. In addition to this testing, we completed diagnostic testing on the remaining GL 89-10 Supplement 3 MOVs (4 valves) and on another 10 safety related MOVs.
- Development of a Program Plan is complete.

SCHEDULE B

SALT SERVICE WATER PIPING REPLACEMENT (LTP #255)

Commitment Description

Develop specific inspection criteria, and conduct inspections and repairs as necessary during RFO #8 to assure piping integrity for Cycle 9 operations is complete. Remaining activities associated with SSW piping will be addressed via our Generic Letter 89-13, Salt Service Water System implementation program.

References

- 1) BECo Letter 88-140, dated September 28, 1988
(Appendix 10 Items #03-924-06 and #03-924-08)

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

- A. Define inspection criteria for SSW piping - Schedule Revised
- B. Identify improved materials for SSW piping - Schedule Revised

The completion dates for these two items are changed to reflect the correct completion dates for each. The schedule depicted in the March 1989 Long Term Program had these items reversed in order of completion. This change is made to correct the record.

Progress and Summary of Changes - February 1990 to November 1990

- A. Define inspection criteria for SSW piping is on schedule for completion by RFO #8 less 60 days.
- B. Improved materials for SSW piping have been identified and we are presently planning detailed implementation based on our first choice of material.

Progress and Summary of Changes - December 1990 to February 1991

We have revised the scope of this commitment as described above under Commitment Description. SSW piping will be inspected during RFO #8 using specific inspection criteria to assure piping integrity during operating Cycle #9. The specific inspection criteria is under development and will be available for use during RFO #8. SSW piping replacement will be determined based on results of piping inspection. When developed, the plan for piping replacement will be provided in a subsequent LTP update.

Progress and Summary of Changes - March 1991 to August 1991

The following inspection plan was implemented in RFO #8 to assure piping integrity for Cycle 9 operation.

- 1) A visual survey of the exterior surface of all accessible Safety Related SSW piping and one third of the accessible Non-Safety Related SSW piping located in the Intake Structure.

ATTACHMENT 2 (Continued)

SCHEDULE B

- 2) A visual survey of the exterior surface of one third of the accessible Safety and Non-Safety Related SSW piping in the Auxiliary Bay.
- 3) A visual examination of the rubber lining of one quarter of the accessible Safety Related SSW piping.
- 4) A visual examination of the rubber lining of the "A" inlet loop.
- 5) Ultrasonic testing of approximately one third of the accessible Safety Related SSW piping. The program stated that if the exterior and interior of the portion of the SSW piping that was intended to be ultrasonic tested (as part of the 1/3), had been visually examined with no indications, a 1/10 sample ultrasonic testing of that piping could be performed.

Approximately 35 pipe spool pieces were inspected. As a result of the inspection, fourteen spools were replaced and five spools were repaired. Of the approximate 35 spools inspected, only two were found with significant degradation; one had a through wall leak and the other experienced lining delamination. Both spool pieces were replaced. The exterior piping surface visual survey required by item 1 and 2 was performed just prior to the outage.

Based on the above, this LTP activity is complete. However, further inspections will be scheduled during each planned mid-cycle or Refueling Outage of sufficient duration, since it remains our intention to replace SSW piping when the inspection of piping shows that to be necessary. Henceforth, any future actions associated with SSW piping will be addressed under the Generic Letter 89-13 activities reported elsewhere in the LTP.

SCHEDULE B

IMPLEMENT ROOT CAUSE AND CORRECTIVE ACTIONS TO ADDRESS CAUSES OF WELD FAILURE
(LTP #31, 292, 400)

Commitment Description

Provide operator access to RHR Vent Valves, Low Pressure Emergency Core Cooling System (LPECCS) Vibration Monitoring, replace RHR Discharge Pressure Switches (Low Pressure Alarm), collect data on throttling globe and gate valves that could cause erosion and vibration problems and determine if alternatives are required. Review of methods to establish MOV thrust will be performed as part of our Generic Letter 89-10, Motor Operated Valve Testing effort.

Reference

BECO Letter 88-140, dated September 28, 1988
(Appendix 10 Items #01-013-01 & #03-916-06),

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

On Schedule for RFO #8.

Progress and Summary of Changes - February 1990 to November 1990

- Operator access to RHR Vent Valves is on schedule for completion by RFO #8.
- LPECCS Vibration Monitoring is on schedule for completion by RFO #8.
- Investigate alternatives to throttling globe and gate valves and review methods to establish MOV thrust are on schedule for completion by RFO #8.
- Replace RHR Discharge Pressure Switches (Low Pressure Alarm) is on schedule for completion by RFO #8.

Progress and Summary of Changes - December 1990 to February 1991

- Operator access to RHR Vent Valves is on schedule for completion by RFO #8.
- One area has been determined to require a permanent modification to facilitate venting. Re-routing of the vent lines for valves 10-HO-397/398 will be performed during RFO #8.
- LPECCS Vibration Monitoring is installed. Additional monitoring will be performed during RFO 8.
- Collect data on throttling globe and gate valves that could cause erosion and vibration problems will be performed during RFO #8.
- Evaluate collected data on throttling globe and gate valves to determine if alternatives are required will be performed post RFO 8.

ATTACHMENT 2 (Continued)

SCHEDULE B

- Review of methods to establish MOV thrust will be performed as part of our Generic Letter 89-10, Motor Operated Valve Testing effort (LTP #487).
- Replace RHR Discharge Pressure Switches (Low Pressure Alarm) is on schedule for completion by RFO #8.

Progress and Summary of Changes - March 1991 to August 1991

- Operator access to RHR Vent Valves is complete
- Re-routing of the vent lines for valves 10-HO-397/398 is complete.
- Additional LPECCS vibration monitoring was performed during RFO #8. The LPECCS vibration monitoring system was activated to monitor during the shutdown cooling mode. The system was set to continuously monitor various accelerometer locations to trigger an alarm upon high vibration due to a water hammer event or valve cavitation. No system activation occurred at the established setpoints and no failure of vent or drain welds were discovered during the last operating cycle. We attribute this reduction in water hammer events to the activities undertaken to enhance venting capabilities as mentioned above and changes made to operator venting instructions such as backflushing to remove any steam bubbles prior to venting. Therefore, we intend to continue the monitoring during the present fuel cycle with lower setpoints. More attention will now be focused on vibration related to steady-state flow and valve cavitation. Steady-state vibration data will be recorded from each data point with the system operating in the torus cooling and mixing modes at various flow rates. An analysis of this steady-state vibration will then be performed. Based on the results of the analysis, additional vibration surveys of the piping system may be performed using portable vibration instrumentation. During the next mid-cycle outage, similar monitoring will be performed with the system in the shutdown cooling mode. Once the vibration under these conditions has been analyzed, we will determine the need for any alternative activities.
- Replace RHR Discharge Pressure Switches (Low Pressure Alarm) is complete.

SCHEDULE B

REALIGNMENT OF CORE SPRAY CHECK VALVES (LTP #294)

Commitment Description

If necessary, implement the physical change and/or configuration necessary to resolve check valves designed for vertical service or reconfigure existing check valves for horizontal use.

Reference

BEC letter 88-140, dated September 28, 1988 (Appendix 10 Item #03-920-09)

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

On Schedule

Progress and Summary of Changes - February 1990 to November 1990

We have assessed the need to implement check valve physical changes and/or check valve reconfiguration and do not consider either to be necessary. The actions taken during RFO #7 to replace the discs with correct material and install anti-rotation pins have resulted in acceptable core spray system performance during Cycle 8 operation. We intend to re-inspect these valves during RFO #8 using specific inspection criteria.

Progress and Summary of Changes - December 1990 to February 1991

Specific inspection criteria for the Core Spray check valves have been developed. Inspection of these valves will occur during RFO #8.

Progress and Summary of Changes - March 1991 to August 1991

Inspection of the Core Spray check valves using specific inspection criteria is complete. The inspection results demonstrated the existing physical design and configuration to be acceptable. No further changes are planned. This item is closed.

SCHEDULE BNRC BULLETIN 90-01: LOSS OF FILL-OIL IN TRANSMITTERS MANUFACTURED BY ROSEMOUNT INC. (LTP #319)Commitment Description

The NRC Bulletin identified safety concerns associated with Rosemount transmitters, Model 1153, Series B, Series D and Model 1154, due to failures resulting from fill-oil leakage. The Bulletin required licensees to identify these models utilized in safety-related and ATWS applications and implement specific actions. The actions include replacement of transmitters identified from the suspect lot, development of a basis for continued operation and implementation of an enhanced surveillance program.

As stated in our response to Bulletin 90-01, we identified Model 1153, Series B, Series D and Model 1154 Rosemount transmitters installed in safety-related and ATWS applications and implemented an Enhanced Surveillance Program for monitoring transmitter performance. The monitoring program consists of operational data trendings, calibration data trendings, and process noise analysis including sluggish transmitter responses. Also, operability acceptance criteria for each transmitter application has been established. The surveillance program will continue until industry resolution is achieved either through NRC or NUMARC.

References

- 1) NRC Bulletin 90-01, dated March 9, 1990
- 2) BECo Letter 90-085, dated July 11, 1990, Response to NRC Bulletin 90-01.

Commitment History/ProgressProgress and Summary of Changes - March 1990 to November 1990

The Rosemount Transmitter Enhanced Surveillance Program is in place and will continue until industry resolution (resolution expected by first quarter of 1991).

Progress and Summary of Changes - December 1990 to February 1991

The Rosemount Transmitter Enhanced Surveillance Program will continue until industry resolution occurs.

Progress and Summary of Changes - March 1991 to August 1991

In May 1991, NUMARC issued Report #91-02 to the NRC summarizing PSI-month and failure data for Rosemount transmitters. The NUMARC report recommended the oil-loss concern should be focused on the subset of installed Rosemount models 1153 and 1154 normally pressurized to greater than 250 PSI but not beyond the applicable threshold PSI-month recommended by the manufacturer. Additionally, Rosemount issued Amendment #3 to the Master Suspect List on July 3, 1991. Our review of this list identified three Rosemount transmitters in drywell pressure applications which are not in the RPS or ESF systems and are pressurized normally below 250 PSI.

ATTACHMENT 2 (Continued)

SCHEDULE B

We are presently evaluating this data for application to our surveillance program. Any reductions in program scope will be transmitted to the NRC under separate cover. We plan to continue monitoring Rosemount transmitter performance until industry resolution occurs.

ATTACHMENT 2 (Continued)

SCHEDULE B

GENERIC LETTER 89-13, SALT SERVICE WATER SYSTEM (LTP #473)

Commitment Description

Generic Letter 89-13 required licensee's to review and evaluate the adequacy of the service water system and all safety related heat exchangers. The review identified a number of enhancements to the PNPS programs and procedures. As a result, BECo committed via Reference 2 to the following:

- Prior to end of RFO #8, modify the RBCCW heat exchanger test procedures to include an analytical model to calculate RBCCW heat exchanger performance at test and design conditions (complete). Conduct tests with modified procedures during Cycle 9.
- Prior to end of RFO #9, modify the RHR heat exchanger test procedures to include an analytical model to calculate RHR heat exchanger performance at test and design conditions. Conduct tests with modified procedures during Cycle 10.
- Develop a regular maintenance/test program on heat transfer capability of the remaining heat exchangers by RFO #9.
- Conduct a Single Failure Analysis for the RBCCW subsystem by end of RFO #8. (Complete)
- Prior to end of RFO #8, upgrade the licensed operator training module to include a loss of all service water. (Complete)

Credit was also taken in Reference 2 for the SSW piping inspection and replacement program already underway at Pilgrim, which henceforth will be integrated as part of our Generic Letter 89-13 implementation efforts.

References

- 1) Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment"
- 2) BECo letter 2.90.047, dated April 2, 1990, "Response to Generic Letter 89-13"

Commitment History/Progress

Progress and Summary of Changes - March 1990 to November 1990

The licensed operator training module upgrade is complete.

There are no changes to the other above-described commitments and schedules.

Progress and Summary of Changes - December 1990 to February 1991

A single failure analysis of the RBCCW subsystem has been performed.

There are no changes to the other above-described commitments and schedules.

ATTACHMENT 2 (Continued)

SCHEDULE B

Progress and Summary of Changes - March 1991 to August 1991

RBCCW heat exchanger test procedures have been modified to include an analytical model to calculate RBCCW heat exchanger performance at test and design conditions.

In addition, activities associated with SSW piping inspection and replacement are being integrated under our GL 89-13 effort. Further inspections of the SSW piping will be scheduled during each planned mid-cycle or refueling outage of sufficient duration. It remains our intention to replace SSW piping when the inspection of piping shows that to be necessary.

ATTACHMENT 2 (Continued)

SCHEDULE B

GENERIC LETTER 91-05, LICENSEE COMMERCIAL - GRADE PROCUREMENT AND DEDICATION PROGRAMS

Commitment Description

Instances of counterfeit and fraudulently marketed vendor products heightened the NRC's concerns for licensees' capability to assure the quality of procured products and to reduce the likelihood of the use of counterfeit or fraudulent products in nuclear power plants. Generic Letter 89-02 (Reference 1) provided details on some of the elements of programs the NRC considers to be effective in providing the capability to detect counterfeit or fraudulently marketed products and in assuring the quality of vendor products. For example, an effective commercial-grade dedication program should include provisions to demonstrate that a dedicated item is suitable for safety-related applications. For a licensee to adequately establish suitability, certain key activities should be performed, as appropriate, as part of the dedication process. The NRC encouraged industry working group efforts to develop guidance in these areas. Generic Letter 89-02 also conditionally endorsed the dedication methods described in EPRI NP-5652 "Guideline for the Utilization of Commercial-Grade Items in Nuclear Safety-Related Applications."

NUMARC took a lead role on this issue and developed and issued to the industry a document entitled "Comprehensive Procurement Initiative" (Reference 2). Issued on behalf of the industry, this document commits licensees to assess their procurement programs and take specific action to enhance or upgrade the programs, where needed, by July 1, 1992.

Generic Letter 91-05 (Reference 3) clarified the dedication approaches described in Generic Letter 89-02 and notified the industry of the NRC staff's pause in conducting procurement inspection and enforcement activities. The pause is intended to allow licensees sufficient time to fully understand and implement guidance developed by industry for procurement improvements and commercial-grade dedication programs. Generic Letter 91-05 also endorsed the NUMARC procurement initiative and milestones and provided additional guidance regarding commercial-grade procurement and dedication programs considered acceptable to meet regulatory requirements.

References

- 1) Generic Letter 89-02, dated March 21, 1989
- 2) NUMARC document "Comprehensive Procurement Initiative," dated June 28, 1991
- 3) Generic Letter 91-05, dated April 9, 1991

ATTACHMENT 2 (Continued)

SCHEDULE B

Commitment History/Progress

Progress and Summary of Changes - March 1991 to August 1991

BECO personnel have attended NUMARC workshops on industry procurement initiatives. Efforts to identify and implement procurement improvements are scheduled for completion by July 1, 1992.

ATTACHMENT 3

ADDITIONAL ITEMS LIST (SCHEDULE C)*

<u>ITEM</u>	<u>February 1991 Target Schedule</u>	<u>Current Status</u>
Cooling Water Betterment (LTP #322)	Ongoing through RFO #9	No change in schedule
Dredging Study (LTP #486)	Cycle 9	Schedule revised to Cycle 9 and ongoing
Logic System Functional Test Mods (LTP #224)	RFO #9	No change in schedule
Turbine Bearing Fire Protection (LTP #234)	Ongoing through RFO #9	No change in schedule
Make Temporary Modifications Permanent (LTP #444)	Cycle 8 & Ongoing	No change in schedule
Analog Trip Drawing Update (LTP #319)	December, 1991	No change in schedule
LP Air System Upgrade (LTP #035)	December, 1991	No change in schedule
Shutdown Bus Energization Mods (LTP #043)	RFO #8 & RFO #9	Transferred to Schedule A SBO
Siren Feedback System (LTP #311)	December, 1991	No change in schedule
Replace Non-Buried Carbon Steel Salt Service Water Pipe (as required by UT Inspection) (LTP #255)	RFO #8	Complete
APM, RBM, and T. S. (ARTS) Improvement Program (LTP #220)	RFO #8	Complete

* Represents a portion of major plant betterments. Total LTP data base contains additional plant betterments, programs/projects and issues.

ATTACHMENT 3

ADDITIONAL ITEMS LIST (SCHEDULE C)*

<u>ITEM</u>	<u>February 1991 Target Schedule</u>	<u>Current Status</u>
E203 Panels - Control Panel Wiring (LTP #119)	Cycle 8 & Ongoing	No change in schedule
Priority B Drawing Update (LTP #051)	Cycle 9	No change in schedule
Design Basis Information System (LTP #264)	Cycle 8 & Ongoing	No change in schedule
Design Configuration Control (LTP #367)	Cycle 8 & 9	No change in schedule
Hanger Drawing Update (LTP #112)	Cycle 8 & 9	No change in schedule
Sanitary Facility Modification (Septic Waste) (LTP #114)	Cycle 8	Complete
Radwaste Betterment (LTP #022)	Cycle 8 & Ongoing	No change in schedule
Spent Resin Storage Tank Replacement (LTP #023)	Removal and Replacement in Cycle 9	No change in schedule
Valve Betterment III (LTP #126)	Ongoing through Cycle 9	No change in schedule
Radiation Source Reduction (LTP #266)	Ongoing through 1992	No change in schedule through 1992
Replace GE Time Delay Relays with Agastat (LTP #414)	RFO #9	Schedule revised to 1992 mid-cycle outage
Ventilation Exhaust Fans 104 A/B Replacement (LTP #331)	Cycle 9	No change in schedule
Instrument Recirc. Pump Shaft (LTP #546)	RFO #8	Shaft testing completed - No cracks. Instrumentation partially completed - on hold.

* Represents a portion of major plant betterments. Total LTP data base contains additional plant betterments, programs/projects and issues.

ATTACHMENT 3

ADDITIONAL ITEMS LIST (SCHEDULE C)*

<u>ITEM</u>	<u>February 1991 Target Schedule</u>	<u>Current Status</u>
Degraded Voltage Study (LTP #015)	Cycle 8 & Ongoing	No change in schedule
Setpoint Control Program Study (LTP #108)	Cycle 10	No change in schedule
Obtain Spare DC Motor Control Centers (LTP #336)	Cycle 9 through RFO #9	No change in schedule
Inspect LP Turbine Rotor (LTP #401)	1992 Mid-cycle outage	No change in schedule
ISI Augmented IGSCC Inspection (LTP #394)	RFO #8	Complete
Abandon In-Place Program (LTP #278)	Ongoing	No change in schedule
TIP System Replacement (LTP #380)	RFO #9	No change in schedule
Damper Inspection Platforms (LTP #337)	RFO #9	No change in schedule
R. V. Beltline Weld Inspection (LTP #399)	RFO #10	No change in schedule
Turbine Trucklock Sprinkler (LTP #236)	RFO #9	No change in schedule
Inspect/Replace Lower Core Support Plate Flow Plugs (GE SIL 359) (LTP #448)	RFO #9	No change in schedule
Digital Feedwater Control (LTP #253)	RFO #9	No change in schedule
Generator Retaining Ring Replacement (LTP #531)	N/A	1992 Mid-cycle outage
Low Level Radwaste Interim Storage (LTP #496)	N/A	Ongoing through 1996
Replace Simplex Panels (LTP #524)	N/A	December 1992
Additional Spent Fuel Storage (LTP #085)	N/A	RFO #10

* Represents a portion of major plant betterments. Total LTP data base contains additional plant betterments, programs/projects and issues.