

BOSTON EDISON COMPANY  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

BECO 83-214  
August 10, 1983

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

Additional Information Concerning Inspection of BWR Stainless Steel Piping

Dear Sir:

As committed in the August 8 meeting with you and members of your staff concerning inspection of BWR stainless steel piping, Boston Edison hereby supplies additional information as follows:

- I. Our program for inspection/repair/replacement of stainless steel piping is being planned commensurate with our scheduled refueling outage of January 1, 1984. At that time we will perform an inspection of 100% of the welds in the recirculation system piping. If indications are discovered in the 12" risers which would require repair, we most probably would replace rather than repair them. If no cracks are observed, we plan to perform IHSI. For the larger diameter piping we will repair as required and IHSI or replace. For all instances, an evaluation consistent with the principles of our Long Term Program would occur before reaching a decision whether to repair or replace.

It is BECO's intention to resolve this issue once and for all which is what we believe our program will accomplish. Actions that fall short of this goal are not considered viable in terms of addressing the problem and applying a lasting solution.

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We prefer our proposed January 1 date as originally budgeted and planned. Accelerating this date to December 1, 1983 creates an unjustified encroachment of one month into our Long Term Program planning time and creates an uncertainty on the availability of inspection personnel relative to their accrued quarterly dose. It also spans the Holiday season, creating difficulty in assembling qualified personnel and imposing hardships on the families of those required to work. In addition, the Pilgrim core will commence to coastdown about the middle of October, 1983, and will be down to about 75% of full power at the time of our scheduled refueling outage on January 1, 1984. Inherent in this power reduction are generally increasing safety margins and during December this increase will be substantial.

- II. At present, PNPS Technical Specifications 3.6.C.2 permits power operation for seven days after the sump sampling system is made or found inoperable. To maintain leak rate measurement capability between now and our scheduled refueling, a more restrictive administrative limit can be imposed. This limit would require that the sump sampling system be returned to operable within three days, or a shutdown shall be initiated and the reactor shall be in cold shutdown within 24 hours (T.S.3.6.C.3). Our choice of three days provides a substantial temporary shortening of the allowable repair time thereby increasing personnel awareness while at the same time maintaining sufficient time to perform adequate repairs on an emergency basis.

The new temporary three day limit would not apply to the air sampling system referenced in 3.6.C.2. This system is used to try to locate the leakage, not measure the leakage rate. A limit greater than that already existing in our Technical Specifications would therefore not improve our leakage rate monitoring, which is the purpose of imposing the more restrictive limit.

- III. Your request that we consider the possibility of performing some of the IEB 83-02 inspections during an unscheduled outage of undefined length has been evaluated. We will commit to look at some welds between now and our scheduled refueling outage using UT techniques for detection and discrimination if we incur an outage that is predicted from the beginning to be 10 days or more in cold shutdown. The number of welds to be inspected will be established so that inspection activities are not on the critical path for the shutdown. However, we would prefer that you reconsider our proposal of conducting visual inspections of the recirculation piping for leakage at intervals of approximately 6 weeks as a more appropriate means, for the next few months, of assuring the structural integrity of our recirculation piping. Should you not agree with us on this matter and opt for conducting the UT inspections during an unscheduled outage, we withdraw our latter proposal.

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- IV. Attached is a letter from Mr. Michael Sherwin of Magnaflux, the firm which conducted the ISI examinations during the 1980 and 1981 outages. Mr. Sherwin is a Level III Inspector who has been qualified to the requirements of IEB 83-02. The letter documents the re-evaluation of data obtained from those outages. The conclusion of this re-evaluation was that the UT test reports, including all data and indication plots, are accurate and complete.

We again wish to re-emphasize our commitment to resolve this issue as expeditiously as is consistent with the public safety and the best interest of those who depend on Boston Edison to provide safe, reliable energy. Now as in the past, though we share the industry's belief that this issue is not an immediate threat to the public health and safety, we have taken actions to provide additional conservatisms. Based on this, we do not believe that an accelerated inspection schedule is justified or prudent because it has the potential of denying us the opportunity to implement our planned program of properly addressing the problem.

Should you have any further questions or concerns after your review of this letter, please do not hesitate to contact us or arrange a meeting at your earliest convenience.

Very truly yours,

W.D. Harrington

Commonwealth of Massachusetts)  
County of Suffolk )

Then personally appeared before me W.D. Harrington, who, being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company, the applicant herein, and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My Commission expires: *October 21, 1988*

*Peter M. Kahler*  
Notary Public

MAGNAFLUX  
Quality Services

August 9, 1983

Boston Edison Company  
25 Braintree Hill Park  
Off Rockdale Street  
Braintree, Massachusetts 02184

ATTENTION: Mr. J. E. Howard

REFERENCE: Pilgrim Nuclear Station

Dear Mr. Howard:

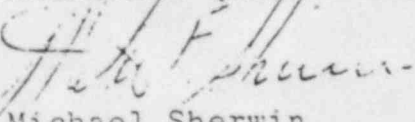
This letter is to confirm my review of the 1980 and 1981 ultrasonic in-service inspection reports of the re-circulation system at the Pilgrim Nuclear Station.

I reviewed the ultrasonic test reports, including all data and indication plots, as applicable to the re-circulation system and found this information to be accurate and complete.

If any further information is needed, please do not hesitate to contact me.

Sincerely,

MAGNAFLUX QUALITY SERVICES



Michael Sherwin,  
ISI Coordinator

MS/mg

CC: Frank Famulari