

**BOSTON EDISON**

Pilgrim Nuclear Power Station  
Rocky Hill Road  
Plymouth, Massachusetts 02360

October 7, 1991  
BECO 91- 127

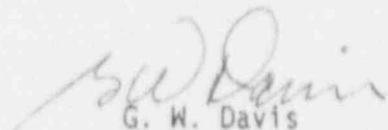
George W. Davis  
Senior Vice President - Nuclear  
U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

License DPR-35  
Docket 50-293

Proposed Changes to Fire Protection Technical Specification

Boston Edison Company (BECO) proposes the attached changes to the Pilgrim Nuclear Power Station (PNPS) Technical Specifications. These changes revise Section 3/4.12, "Fire Protection," in accordance with guidance provided in NRC Generic Letters (GL) 86-10 and 88-12. It relocates most of existing Fire Protection Technical Specifications into a Fire Protection Program referenced in Pilgrim's Final Safety Analysis Report (FSAR). Included in these changes is a minor, unrelated administrative change deleting an outdated reference to "Appendix A" of 10CFR Part 55.

The requested changes are described in Attachment A; the revised Technical Specification pages are in Attachment B; Attachment C provides existing pages marked-up to show the proposed changes; Attachment D provides a list of affected pages; and Attachment E provides a copy of Pilgrim's amended FSA, pages related to this proposed change.

  
G. W. Davis

PMK/clc/5900

Attachments

1 signed original and 37 copies

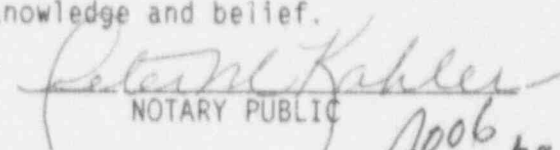
cc: see next page

Commonwealth of Massachusetts)  
County of Plymouth )

Then personally appeared before me, George W. Davis, who being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company 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 5, 1995  
DATE

  
NOTARY PUBLIC

9110160167 911007  
PDR ADDOCK 05000293  
PDR

A006  
1/10/98

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

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

Senior NRC Resident Inspector  
Pilgrim Nuclear Power Station

Mr. Robert M. Hallisey, Director  
Radiation Control Program  
Massachusetts Department of Public Health  
305 South Street  
Jamaica Plain, MA 02130

## ATTACHMENT A

### PROPOSED CHANGES TO FIRE PROTECTION TECHNICAL SPECIFICATION

#### PROPOSED CHANGES

These proposed changes revise Pilgrim Nuclear Power Station's (PNPS) Technical Specifications by relocating parts of section 3/4.12, "Fire Protection", into Pilgrim's Final Safety Analysis Report (FSAR) and by making related changes to other Technical Specification sections in support of the relocation. These proposed changes were developed in accordance with the guidance contained in NRC Generic Letters (GL) 86-10 and 88-12 and are consistent with NRC and industry efforts to simplify Technical Specifications. The associated change to the FSAR was made in the 1991 update as part of Revision #13. These changes also make a minor administrative correction unrelated to Fire Protection.

Specifically, the proposed changes include:

- Replacing Pilgrim License Conditions F, "Fire Protection," with the standard license condition as shown in GL 86-10;
- Deleting section 3.12, "Fire Protection System Limiting Conditions for Operation" (LCOs) and 4.12, "Fire Protection System Surveillance Requirements" and relocating the requirements into a Fire Protection Program by referencing it in the FSAR;
- Relocating section 6.2.B.6, dealing with the composition of the Fire Brigade, to the Fire Protection Program;
- Relocating the part of section 6.4 specifying Fire Brigade training requirements to the Fire Protection Program;
- Modifying section 6.5.A.6.j to require the Operations Review Committee (ORC) to review changes to the Fire Protection Program;
- Removing an obsolete reference to Appendix A of 10CFR Part 55 in section 6.4.

#### REASON FOR CHANGES

These changes are proposed to allow changes not affecting safety to be made to the Fire Protection Program without prior NRC approval. Such changes would be made in accordance with the 10CFR50.59 process. The proposed changes also simplify Technical Specifications by replacing the detailed LCO's and surveillance requirements with references to the Fire Protection Program. They were developed and are submitted in accordance with NRC guidance provided by Generic Letters 86-10 and 88-12.

The changes also remove the "Appendix A" reference in section 6.4 because Appendix A no longer exists in 10CFR Part 55.

#### NO SIGNIFICANT HAZARDS CONSIDERATION AND SAFETY EVALUATION

The commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an

operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

Boston Edison has determined the proposed change does not involve a significant hazards consideration on the basis of the following analysis:

- 1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. Generic Letter 88-12 encourages licensees to remove unnecessary fire protection technical specifications and incorporate the technical specification requirements into the Fire Protection Program. The technical specification requirements concerning fire protection have been incorporated into the Pilgrim Fire Protection Plan as referenced by Pilgrim's FSAR. This change to fire protection technical specifications is administrative only as is the deletion of the obsolete reference to "Appendix A" and does not affect current plant practices. Therefore, this proposed change will not significantly increase the probability or consequences of an accident previously evaluated.
- 2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. Deletion of the reference to "Appendix A" is strictly administrative because the Appendix no longer exists. The proposed change to fire protection does not involve any physical alteration of plant configurations, changes to setpoints, or operating parameters. It is an administrative change only and retains all existing fire protection requirements; therefore, it does not create the possibility of a new or different kind of accident.
- 3) The proposed change does not involve a significant reduction in a margin of safety. The fire protection portion of this change is in accordance with GL86-10 and 88-12 guidelines for incorporating the Fire Protection Program into Pilgrim's FSAR. The change is administrative and ensures that the Fire Protection Program will be on a consistent status with other plant features described in the FSAR. The Fire Protection Program retains all existing fire protection requirements and, therefore, an equivalent level of protection has been assured without a reduction in a margin of safety.

This proposed change was reviewed and its approval recommended by Pilgrim's Operations Review Committee. It was also reviewed by the Nuclear Safety Review and Audit Committee.

#### SCHEDULE FOR CHANGE

These changes will be implemented within 30 days of BECo's receipt of approval by the NRC.