

BOSTON EDISON

Pilgrim Nuclear Power Station
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Pilgrim Nuclear Power Station
Inservice Test Program (IST) Implementation

In a letter to Boston Edison Company (BECO) dated April 22, 1991, a Safety Evaluation Report (SER) was issued for the Pilgrim Nuclear Power Station IST program.

The SER granted relief from certain requirements of Section XI of the ASME Code provided program/procedural changes were addressed within six months of receipt of the SER. We are requesting an extension of three months to implement the program changes required for Relief Requests RP-1 and RP-5.

In RP-1 and RP-5 we requested relief from Section XI requirement IWP-3100 to measure flow rate quarterly and proposed as an alternative method of testing to measure shutoff head quarterly and individual pump flow rate and pressure each refueling outage. The SER granted conditional relief for RP-1 and RP-5 provided the pumps are tested during cold shutdowns according to the ASME Code test requirements. Testing is to begin as soon as practicable (within 48 hours) during cold shutdown and continue until all pumps are tested or the plant is ready to startup.

The system cooling loads supplied by these pumps during cold shutdown have to be evaluated and additional procedural controls developed to implement the test requirements during cold shutdown. This effort is ongoing and we will have the procedures in place and the conditions specified in the SER Technical Evaluation Report (TER) Sections 2.2.1 and 2.4.1 fully met by January 24, 1992.

The subject pumps were tested and individual flow rates measured during RFO #7 with satisfactory results and presently quarterly tests are performed to measure and trend shutoff head and vibration.

Further, in conversations with your staff, two items were discussed that required a revision to the SER to resolve. First, Cold Shutdown Justification CS-03 was approved with the provision the subject valves are full-stroke exercised using flow each refueling outage. As approved CS-03 requires partial-flow exercising of the valves during cold shutdowns and full-stroke exercising using flow during refueling outages.


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However, these valves have been placed into the IST disassembly program that is outlined in RV-27 (TER Section 3.1.3.1) and relief was granted from the requirement to full-stroke exercise the subject valves using flow. Your staff indicated that when reviewing CS-03 they had overlooked RV-27 and would revise the SER to remove the provision in CS-03 to full-stroke exercise these valves using flow during refueling outages.

Secondly, throughout the SER where tests are required to be performed each refueling outage it is stated: "For inservice testing purposes the interval associated with refueling outage testing may be up to 2 years with an allowable extension of no more than 25%. The combined time interval for any three consecutive refueling outage test intervals shall not exceed 3.25 times 2 years or 6.5 years." This requirement is inconsistent with Generic Letter 89-14, "Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals," and more specifically our Technical Specifications. This was discussed with your staff and it was agreed the language in the SER would be revised to reflect the guidance provided in Generic Letter 89-14.

In conclusion, we will have the requirements stated in Sections 2.2.1 and 2.4.1 of the TER relief requests RP-1 and RP-5 implemented by January 24, 1992. Further, we understand that the SER will be revised for CS-03 to remove the requirement to full-stroke exercise the subject valves using flow each refueling outage and the guidance provided in Generic Letter 89-14 will be incorporated into the SER.


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BRS/clc/6277

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