

BOSTON EDISON COMPANY  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

March 20, 1984  
BECO 84-044  
Proposed Change 84-01

Mr. D. B. Vassallo, Chief  
Operating Reactors Branch #2  
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

Pilgrim Station Proposed Technical Specification Change

Dear Sir:

Pursuant to 10 CFR 50.90, Boston Edison Company hereby proposes the modifications to Facility Operating License No. DPR-35 as described in Attachment A to this letter. In accordance with 10 CFR 170.22 a check in the amount of \$4,000 is enclosed with this submittal.

Should you have any questions concerning this submittal, please do not hesitate to contact us.

Very truly yours,

TFF/kmc

*W D Harrington*

Attachment

3 signed originals and 37 copies

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 the 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 the 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

cc: Mr. Robert M. Hallisey, Director  
Radiation Control Program  
Massachusetts Dept. of Public Health  
600 Washington Street, Room 770  
Boston, MA 02111

B403270055 B40320  
PDR ADOCK 05000293  
P PDR

*Appt w/ check \$4,000  
1/1 #849574*

## Attachment

### Proposed Technical Specification Change

#### Proposed Change

This proposed Technical Specification change removes the details of the Section XI Inservice Inspection (ISI) Program. The requirement to implement the ISI Program at the required intervals will not be removed. The details of the ISI Program will be administratively handled as a controlled document. Snubber inspection requirements are left in the Technical Specifications but the table listing snubbers on Code Class 1, 2, and 3 systems will be removed and become part of the controlled ISI Program document.

Reference is made to the following Pilgrim Nuclear Power Station Technical Specification Sections, Tables, and Bases:

Section 3.6.G	"Structural Integrity"
Section 4.6.G	"Structural Integrity"
Section 4.6.H	"High Energy Piping (Outside Containment)"
Table 4.6.1	"Inservice Inspection Requirements for Pilgrim Station Nuclear Power Station"
Section 3.6.I	"Shock Suppressors (Snubbers)"
Section 4.6.I	"Shock Suppressors (Snubbers)"
Table 3.6.I(a)	"Safety Related Hydraulic Shock Suppressors (Snubbers)"
Bases 3.6.G & 4.6.G	"Structural Integrity"
Bases 3.6.I & 4.6.I	"Shock Suppressors (Snubbers)"

Section 3.6.G The reference to the ASME Boiler and Pressure Vessel Code has been changed from the 1974 Edition to the 1980 Edition, Winter 1980 Addenda. The remainder of this section has been deleted.

Section 4.6.G The reference to "Table 4.6.I" has been replaced with "Pilgrim Station Inservice Inspection Program". Conforming changes have been made to reflect the ten year interval requirements.

Section 4.6.H The reference to the ASME Boiler and Pressure Vessel Code has been changed from the 1974 Edition to the 1980 Edition, Winter 1980 Addenda.

Table 4.6.1 This table has been deleted.

Section 3.6.I The reference to "Table 3.6.I(a)" has been replaced with "Pilgrim Station Inservice Inspection Program".

Section 4.6.I The reference to "Table 3.6.I(a)" has been replaced with "Pilgrim Station Inservice Inspection Program".

Table 3.6.I(a) This table has been deleted.

Bases 3.6.G & 4.6.G Refer to marked up pages for extent of changes.

Bases 3.6.I & 4.6.I Refer to marked up pages for extent of changes.

#### Reason for Change

This proposed Technical Specification will allow ISI changes to Code Class systems without a subsequent Technical Specification Change, but does not remove the commitment to perform ISI per Section XI nor does it remove the commitment to test Code Class Snubbers at the required intervals. The details of the ISI Program will be kept as a controlled document so Section XI modifications, repairs, or replacements can be accurately captured in the program.

This approach is similar to the BWR Generic Technical Specifications in the area of ISI on Code Class 1, 2, and 3 components. The Generic Technical Specifications do not require a detailed table outlining the entire ISI program by system, weld, pump, etc.

#### Safety Considerations

This change does not present an unreviewed safety question as defined in 10 CFR 50.59. It has been reviewed and approved by the Operations Review Committee and reviewed by the Nuclear Safety Review and Audit Committee.

#### Significant Hazards Considerations

It has been determined that this amendment request involves no significant hazards consideration. Under the NRC's regulations in 10 CFR 50.92, this means that operation of the Pilgrim Nuclear Power Station 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.

The NRC has provided guidance concerning the application of standards for determining whether license amendments involve significant hazards considerations by providing certain examples (48 FR 14870). One example of an amendment that is considered not likely to involve a significant hazards consideration is "... (vii) A change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations."

Changes to the ASME Boiler and Pressure Vessel Code, which is incorporated by reference in 10 CFR 50.55a, have necessitated changes to the Pilgrim Station Inservice Inspection Program, as implemented in the Pilgrim Station Technical Specifications. Therefore this proposed Technical Specification will conform to reflect these changes. Facility operations will not be impacted because the ISI requirements will still be satisfied. The methodology for implementation of the ISI requirements is satisfactory in that it conforms with the BWR Generic Technical Specifications.

#### Schedule of Change

This change will be put into effect in 30 days upon receipt of approval from NRC.

#### Fee Determination

Pursuant to 10 CFR 170.22 Boston Edison Company proposes this change as Class III. The sum of \$4,000 is submitted and should be applied toward this proposed change and for the related review of our proposed Second Ten Year Inservice Inspection Program.