

BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
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Roy A. Anderson

Senior Vice President - Nuclear

April 8, 1992

BEC0 92-039

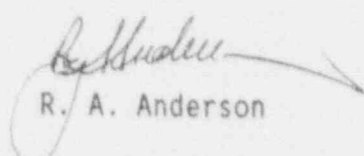
U.S. Nuclear Regulatory Commission
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License DPR-35
Docket 50-293

Proposed Administrative Technical Specification
Change to Section 4.7: Primary Containment Integrity

Boston Edison proposes the attached changes to Section 4.7 "Primary Containment Integrity" of the Pilgrim Nuclear Power Station Technical Specifications in accordance with 10CFR50.90. The proposed change removes the words "each operating cycle" for Main Steam Isolation Valve and personnel air lock door testing. This change will clarify that the test intervals are as required by 10CFR50 Appendix J.

The requested change is described in Attachment A, the revised Technical Specification page is in Attachment B, and the current Technical Specification page, annotated to indicate the requested revisions, is in Attachment C.


R. A. Anderson

MTL/clc/6819

Attachments

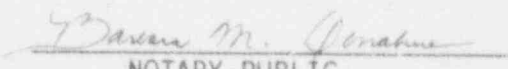
1 Signed Original and 37 Copies

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Commonwealth of Massachusetts)
County of Plymouth)

Then personally appeared before me, Roy A. Anderson, 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:

4/16/93
DATE

NOTARY PUBLIC

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BOSTON EDISON COMPANY

U. S. Nuclear Regulatory Commission

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Proposed Change

The proposed changes to the Pilgrim Technical Specifications are administrative in nature and do not change plant design, plant configuration or code requirements.

Technical Specification Section 4.7.A.2.a(1) states:

The main steam line isolation valves shall be tested at a pressure ≥ 23 psig, and normalized to a value equivalent to 45 psig each operating cycle.

Technical Specification Section 4.7.A.2.a(2) states:

Personnel air lock door seals shall be tested at a pressure ≥ 10 psig each operating cycle.

The proposed changes delete "each operating cycle" from these surveillance statements.

Reason for Change

The existing wording of the MSIV surveillance may impact our current operating cycle. Pilgrim Technical Specification Section I.V defines "operating cycle" and requires MSIV testing every 18 months. A 25% tolerance is allowed, giving a maximum interval of 22.5 months. It is preferable to perform MSIV Local Leak Rate Tests during refueling outages which are currently scheduled on a 24 month interval. Removing the words "each operating cycle" clarifies the test interval of each reactor shutdown for refueling but in no case at intervals greater than 2 years is as required by 10CFR50 Appendix J.

These surveillance statements are intended only to allow main steam isolation valve (MSIV) and air lock door testing to be performed at pressures less than that required by 10CFR50 Appendix J. These exemptions were formally requested in our letter dated October 10, 1975 and approved by the NRC in a letter dated July 2, 1984.

The change for the personnel air lock door is being submitted to clarify that test schedules are as required by 10CFR50 Appendix J. Removing the words "each operating cycle" clarifies that the test interval is as required by 10CFR50 Appendix J.

This change is administrative because the purpose of the surveillances (testing MSIV's at 23 psig and door locks at 10 psig) is unchanged.

Determination of No Significant Hazards

The Code of Federal Regulations, 10CFR50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis, using the standards in 10CFR50.92, about the issue of no significant hazards consideration. Therefore, in accordance with 10CFR50.91 and 10CFR50.92 the following analysis has been performed.

1. The operation of Pilgrim Station in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change deleting the words "each operating cycle" from Surveillance 4.7.A.2.a(1) does not involve a significant increase in the probability or consequences of an accident previously evaluated. This change is administrative in nature. It allows Pilgrim's 18 month (+25%) interval for performing Local Leak Rate Testing of the Main Steam Isolation Valves to be scheduled at 24 month intervals in accordance with 10CFR50 Appendix J. This change does not affect plant operation or design.

The proposed change deleting the words "each operating cycle" from Surveillance 4.7.A.2.a(2) does not involve a significant increase in the probability or consequences of an accident previously evaluated. This change is administrative in nature. It clarifies the interval for performing Local Leak Rate Testing of the personnel air lock door in accordance with 10CFR50 Appendix J.III.D.2.b.ii which requires testing at 6 month intervals. This change does not affect plant operation or design.

2. The operation of Pilgrim Station in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment does not create the possibility of a new or different kind of accident than previously evaluated because the proposed changes are administrative in nature and involve no physical alterations of plant configuration, no changes to setpoints or operating parameters, or exemptions from code requirements.

3. The operation of Pilgrim Station in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.

The proposed amendment clarifies the appropriately allowed test interval and does not involve a significant reduction in a margin of safety because MSIV testing will continue to be conducted in accordance with the 10CFR50 Appendix J interval as will the personnel air lock testing.

This change has been reviewed and recommended for approval by the Operations Review Committee and reviewed by the Nuclear Safety Review and Audit Committee.

Schedule of Change

This change is desired on or before October 1, 1992. This change will allow MSIV testing to be scheduled during RFO #9 instead of being performed during the mid-cycle outage in October 1992. This change will be implemented within 30 days following Boston Edison's receipt of its approval by the Commission.