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WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

June 20, 1984  
BECO 84-088  
Proposed Change 84-04

Mr. Domenic 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

Proposed Technical Specification  
Change on Shift Staffing

Dear Sir:

Pursuant to 10CFR50.90, Boston Edison Company hereby proposes the attached modification to Appendix A of Operating License No. DPR-35. This modification changes shift staffing to conform with 10 CFR 50.54(m)(2), and addresses an NRC change request of December 30, 1983

Very truly yours,

*W D Harrington*

PMK/kmc

Attachment  
One original and 39 copies

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

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. Kabilian*  
Notary  


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Proposed Change to the Shift Staffing  
Technical Specification

Proposed Change

Reference is made to Table 6.2-1 and Section 6.2.B.2 of Pilgrim Nuclear Power Station's Technical Specification, Appendix A. This table and its notes describe the composition of the minimum shift crew for various states of reactor operation.

Present technical specifications require one licensed Senior Reactor Operator (SRO) when Pilgrim is in the Operating mode.

The proposed change shall require two licensed Senior Reactor Operators when the plant is operating. Associated with this change is a clarifying note, (b).

Note (b) states that a Shift Technical Advisor (STA) with a Senior Reactor Operator license may simultaneously serve as both STA and SRO.

The purpose of requiring two SROs on an operating shift is to provide an additional source of SRO expertise when needed. When licensed, the STA is qualified to fulfill the second SRO role as shift demands dictate.

Currently, Section 6.2.B.2 states:

At least one Licensed Operator shall be in the control room when fuel is in the reactor.

The proposed change, made in conformance with the requirements of 10 CFR 50.54(m)(2)(iii), replaces this with:

When the unit is in an operational mode other than cold shutdown or refueling, a person holding a Senior Reactor Operator License shall be present in the control room at all times. In addition to this Senior Operator, a Licensed Operator or Senior Operator shall be present at the controls when fuel is in the reactor.

Current technical specifications contain a note associated with the Shift Technical Advisor.

This note and its footnote, (1), describe the education, training and experience required of an STA. The proposed change removes this material because Boston Edison believes that stating such personnel qualifications is inconsistent with the purpose of technical specifications, and serves no useful purpose to the technical specification user. In addition, STA qualifications are contained in NUREG 0737 and in the Boston Edison STA job description which reflects the NUREG.

The proposed change substitutes numbers for the asterisks currently used to identify notes. This pro forma change is proposed for clarity.

### Reason for Change

The primary reason for this proposed change is to allow Table 6.2-1 and Section 6.2.B.2 to reflect changes to 10 CFR 50.54(m)(2). The changes to 10 CFR 50.54 (m)(2) were made to reflect lessons learned in the wake of the Three Mile Island incident of 1979, and to implement the corrective action described in NUREG 0737.

In addition, the NRC letter of December 30, 1983 from Mr. D. G. Eisenhut to Mr. W. D. Harrington instructed Boston Edison to take action as necessary to amend the plant technical specifications to incorporate the 10 CFR 50.54(m)(2) shift manning revision.

Further changes, such as renumbering the notes and deleting the STA qualification notes, are proposed to add clarity or remove information not germane to setting minimum shift staffing requirements.

### Safety Considerations

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

### Significant Hazards Consideration

The Commission has provided guidance for the application of the standards for determining whether a significant hazard consideration exists by providing examples of amendments that are considered not likely to involve significant hazards considerations (48 FR 14870).

One such change involves a purely administrative change which constitutes a change in nomenclature: the renumbering of the notes associated with Table 6.2-1 is such a change. Another example of an administrative change is a change made to achieve consistency throughout Technical Specifications: the deletion of the note concerning STA qualifications is such a change.

Another example of amendments which are not likely to involve significant hazards consideration are amendments which constitute an additional restriction or control not presently found in Technical Specifications, or a change to make a license conform to changes in the regulations. Incorporating the requirement for an additional Senior Reactor Operator and the associated change in 6.2.B.2 are changes which fall within the purview of both examples.

Analysis of the proposed amendment in light of the examples supports a determination that the amendment request involves no significant hazards consideration because the 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.

#### Schedule of Change

The requirements of 10 CFR 50.54(m) are already governing minimum shift staffing at Pilgrim Nuclear Power Station. The proposed amendment will be put into effect upon receipt of approval by the Commission

#### Fee Determination

Pursuant to 10 CFR 170.12 Boston Edison proposes that this change requires no fee because this amendment results from a written Commission request, is required to conform to 10 CFR 50.54(m)(2), and has been the subject of NRC Confirmatory Orders.