

BOSTON EDISON COMPANY
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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

June 27, 1984
BECO. 84-092

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, D. C. 20555

License No. DPR-35
Docket No. 50-293

Response to Generic Letter 84-09

Dear Sir:

Boston Edison Company has reviewed the criteria specified in Generic Letter No. 84-09 of May 8, 1984, and has determined that they are applicable as follows:

- 1) Although our present Technical Specification stipulates "less than 5% oxygen", the concentration in containment is kept below 4% during normal plant operation. We will change the Technical Specification to "less than 4% oxygen".
- 2) The plant has nitrogen in containment along with instrument air capability. The final conclusion to this criteria is incorporated below.
- 3) The only source Pilgrim has to consider is service air at the tie between the nitrogen and air systems. All electrical penetrations are pressurized with nitrogen. We are recommending that Criteria Nos. two (2) and three (3) would be satisfied if NRC would accept a new LCO allowing the containment to initially contain air at startup (to allow containment habitability for leak surveillance testing), with nitrogen inerting commencing within twenty-four (24) hours after startup. If the nitrogen feed were lost, instrument air would be utilized until the nitrogen feed were restored or the plant would be shut down within twenty-four (24) hours.

Conformance to these criteria allows Pilgrim Station to obviate the need for an internal recombiner or external recombiner capability mandated by 10 CFR 50.44(c)(3)(ii).

Please be advised that a plant specific examination of data has been initiated through the BWR Owners Group which will ensure applicability to Pilgrim Station of the generic studies submitted by the Mark I Owners' Group. A response to this examination of data is expected from General Electric in early July.

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Completion of this task should provide detailed justification for criteria two (2) and three (3). These results will be submitted for your review. In the meantime, an expeditious submittal of Technical Specifications will be initiated to satisfy the requirements of Criteria one (1).

We have discussed this approach with Mr. Vernon Rooney and Mr. Paul Leech of your staff and they have indicated this to be acceptable. The possibility exists, however, that full compliance to our proposed actions to the Generic Letter criteria may not be completed prior to the startup of Pilgrim Station. It is therefore requested that we be granted scheduler relief from the requirements of 10CFR 50.44 (c) (3) (ii) until such time that written approval of our methods for compliance with 10CFR 50.44 is provided by your office.

Very truly yours,

W.D. Harrington

ERM/kmc