

BOSTON EDISON COMPANY  
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WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

July 30, 1984  
BEC0 84-115  
Proposed Change 84-07

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  
Reactor Pressure Vessel Thermal  
and Pressurization Limits

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 revises the thermal and pressurization limits for the Pilgrim reactor pressure vessel and is required before beginning the hydro test for restart from our current refueling outage. Because this hydro test is currently scheduled to begin September 21, 1984, it is requested that this proposed Technical Specification change receive your immediate attention.

The application fee of \$150.00 for this operating license amendment was previously submitted to Ms. Reba M. Diggs of the License Fee Management Branch by our Check #864069, dated July 5, 1984.

Please contact us if any further information is required.

Very truly yours,

*W.D. Harrington*

DMV/kmc  
Attachment  
One original and 39 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: 12/3/87

*Deanne M. Riddle*  
Notary Public

cc: See next page

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Mr. Domenic B. Vassallo, Chief

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

Ms. Reba M. Diggs  
Facilities Program Coordinator  
License Fee Management Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attachment  
Proposed Technical Specification Change  
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Proposed Change

The proposed change involves Pilgrim Nuclear Power Station Technical Specifications, Appendix A, Section 3/4.6.A, Primary System Boundary Thermal and Pressurization Limitations; Figures 3.6.1 and 3.6.2; and Bases 3/4.6.A. In addition, a new Table 4.6.2 is proposed to be added to Technical Specifications. The proposed changes are described below and are shown on attached Technical Specification Pages 123, 124, 124A, 128, 128A, 139, and 139A.

- a. In an administrative change, the information presented in existing Figures 3.6.1 and 3.6.2 is proposed to be reformatted as shown on the attached figures to clarify the information. Specifically, existing Figure 3.6.1 contains the thermal and pressurization limits for both 1) hydro and leak tests, and 2) subcritical and critical heatup and cooldown. Existing Figure 3.6.2 provides an adjustment to the pressurization temperature of existing Figure 3.6.1 to compensate for neutron exposure of the reactor vessel during the life of the plant. To clarify these figures, it is proposed that the limits for hydro and leak tests be shown on revised Figure 3.6.1 and that the limits for subcritical and critical heatup and cooldown be shown on revised Figure 3.6.2. On each of these revised figures, the pressurization temperature adjustment for neutron exposure is shown directly on the curves.
- b. An added restriction is proposed in Section 3.6.A.2 (Page 123) to specify the proper actions that the reactor operator should take if the required thermal and pressurization limits are not met. Because the existing Technical Specifications do not specify remedial action in this instance, failure to meet this limiting condition for operation currently would require the operator to shut down the reactor, per 10CFR50.36(c)(2). In this instance, an immediate reactor shutdown would introduce rapid thermal and pressure transients and does not constitute safe operation with a potentially endangered reactor pressure vessel. The proposed action statement would require the operator to stabilize reactor conditions with reactor vessel temperature above the required limit, while an engineering evaluation is performed to determine appropriate further actions.
- c. The following changes to Technical Specifications are proposed to conform to changes made in 10CFR50, Appendix G, Fracture Toughness Requirements, and Appendix H, Reactor Vessel Material Surveillance Program Requirements. These regulation changes were made by revision dated May 27, 1983 (48FR24009 and 24011).

1. Table 4.6.2, Reactor Vessel Material Surveillance Program Withdrawal Schedule, is proposed to be added to Technical Specifications. As required by 10CFR50, Appendix H, this new table details the withdrawal schedule for the material surveillance capsules at Pilgrim.
2. The thermal and pressurization limit curves on attached Figures 3.6.1 and 3.6.2 have been revised to reflect the changes in requirements made to 10CFR50, Appendix G. Supporting documentation for the changes made to Figures 3.6.1 and 3.6.2 to affect compliance with 10CFR50, Appendix G is provided in the attached report from Teledyne Engineering Services, TR-6052-1, Revision 2, dated July 19, 1984.
- d. In addition to the above, the thermal and pressurization limit curves on attached Figures 3.6.1 and 3.6.2 have been adjusted to reflect the  $RT_{NDT}$  shift determined from actual testing of the first material surveillance capsule required by 10CFR50, Appendix H. This adjustment is required by 10CFR50, Appendices G and H to verify, and correct as necessary, the valves used in Figures 3.6.1 and 3.6.2. As such, this change is one which may reduce in some way a safety margin, but where the results of the change are clearly within all acceptance criteria for the margin in the Standard Review Plan.
- e. Technical Specification Bases 3/4.6.A are proposed to be revised as attached to reflect the above proposed Technical Specification changes.

#### Safety Considerations

This change does not involve an unreviewed safety question as defined in 10CFR50.59. 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 the amendment request involves no significant hazards consideration. Under the NRC's regulations in 10CFR50.92, 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 (48FR14870). As described above, the proposed change presents examples of four types of amendments that are considered not likely to involve a significant hazards consideration. The corresponding examples from 48FR14870 are listed below.

- a. "... (1) A purely administrative change to technical specifications..."

- b. "... (ii) A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications..."
- c. "... (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."
- d. "... (vi) A change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan..."

#### Schedule of Change

This change will be put into effect upon receipt of approval by the NRC.

#### Fee Submittal

Pursuant to 10CFR170.12, the application fee of \$150.00 for this proposed operating license amendment has been previously submitted to the NRC. This payment was made by our Check #864069, dated July 5, 1984, submitted to Ms. Reba M. Diggs, Facilities Program Coordinator of the License Fee Management Branch.