

BOSTON EDISON COMPANY
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

March 20, 1985

BECO 85-057

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 DPR-35
Docket 50-293

Subject: Pilgrim Nuclear Power Station
Fire Protection Exemption Requests

- References:
- 1) NRC Letter dated 12/18/85, "Exemptions to Section III.G of Appendix R," issuing the exemption from technical requirements of Appendix R to 10CFR50.
 - 2) "Notice of Environmental Assessment and Finding of No Significant Impact" issued by NRC, dated November 27, 1984.
 - 3) Telecon between BECo and NRC on 1/10/85.
 - 4) BECo Letter 83-130, dated 5/17/83, Appendix R Exemption Requests.
 - 5) BECo Letter 84-049 dated 4/2/84, "Additional Information in Support of Appendix R Exemption Requests 5, 7 and 8.

Dear Sir:

In a telephone conversation on January 10, 1985 your Mr. Paul Leech and J. Stang were apprised of two deviations that BECo had identified between the exemptions issued by your staff (References 1 and 2) and the exemptions filed by BECo per References 4 and 5.

One of the deviations dealt with the staff's statement for the Torus Compartment (Exemption #5) that "one train of redundant cables is enclosed in a one-hour rated barrier." During the telephone conversation your staff was informed that BECo was committed to enclose only the Torus Water Temperature Lines. We did not commit to wrap both the Torus Water Temperature and Level Lines (as meant by one train of redundant cables). We were advised to provide justification for our choosing only the Torus Water Temperature Lines. Boston Edison wants to point out that the Exemption #5 submitted to your staff per References 4 & 5 provided a detailed basis for our exemption request. However, we reiterate the following:

Our justification for wrapping only the Torus Water Temperature Lines was based on the fact that the four Torus Water Level instruments are located

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To: P. Leech

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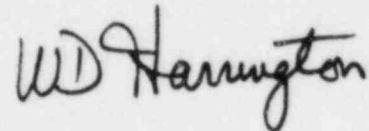
about 90° apart on the outside of the Torus Compartment. Only one of the four instruments is required to be functional at any time to provide the Control Room operators with indication of torus water level. Table 5.1 of Reference 4 provided you with a detailed fire hazard analysis for the Torus Compartment and the analysis lends adequate justification for our stated position. We are enclosing a copy of Figure 4 which was initially enclosed in Reference 1.

The second deviation was related to the statement in Item 4.2 of page 6 in the Safety Evaluation Report (Reference (1)) that the Vital M.G. Set Room is separated from other areas of the plant by 3-hour rated fire barriers. Your staff was advised that the door separating the Vital M.G. Set Room and the stairway area is rated as 1-hour while the rest of the enclosure is 3-hour rated. Also, both the Vital M.G. Set Room and the stairway are of the same safety division and justifies the one-hour rating for the door.

Based upon the clarifications provided above, you are requested to reissue the Exemption to specifically incorporate these clarifications.

We would be pleased to answer any question you may have regarding this submittal.

Very truly yours,



TAV/ns

Enclosures

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