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April 11, 1985
BECO 85-071

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

Response to Generic Letter 83-36:
Containment Hydrogen Monitors (II.F.1.6)

Dear Sir:

By Generic Letter 83-36, dated November 1, 1983, the NRC provided suggested technical specifications for a number of NUREG 0737 items scheduled for implementation after December 31, 1981. Among these was II.F.1.6, Containment Hydrogen Monitoring.

A review of Pilgrim Nuclear Power Station (PNPS) Technical Specifications indicates that surveillance requirements and limiting conditions of operation were provided for containment hydrogen monitoring instrumentation as Technical Specification 3/4.7.A.7.c by Amendment No. 55. This amendment was approved by NRC on March 20, 1982. Boston Edison believes that Technical Specification 3/4.7.A.7.c is in general conformance with the recommendations of Generic Letter 83-36, with two exceptions.

First, the existing calibration frequency is six months instead of the 92 days exemplified in Standard Technical Specifications. We believe this frequency is acceptable because it was acceptable for hydrogen analyzing equipment which has since been upgraded.

The second exception is that the existing location and format of Technical Specification 3/4.7.A.7.c is different from that suggested by the Generic Letter. We believe this difference is acceptable because it is not substantive, and because BECO personnel are trained and familiar with the existing location and format. A change would be strictly administrative, and would provide no increase in safety.

Based on the above, BECO believes the technical specification requirements of II.F.1.6 are met by existing Technical Specification 3/4.7.A.7.c, and that no further action on this is necessary. Should you wish further information on this, please contact us.

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Very truly yours,

W.D. Harrington

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