

BOSTON EDISON COMPANY
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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

February 14, 1985

BECo 85-033

Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

License DPR-35
Docket 50-293

Subject: Environmental Qualification of Electrical
Equipment at Pilgrim Nuclear Power Station
Certification of Compliance to 10CFR50.49

- References: 1) NRC Generic Letter #84-24,
dated December 27, 1984
2) BECo Letter #2.85.013, dated 1/21/85
W. D. Harrington to D. G. Eisenhut
3) BECo Letter #2.85.020 dated 1/29/85,
W. D. Harrington to H. R. Denton
4) BECo Letter #2.84.119, dated 8/3/84,
W. D. Harrington to Domenic B. Vassallo

Dear Sir:

Boston Edison received the Generic Letter 84-24 dated December 27, 1984 on January 15, 1985. The Generic Letter required Boston Edison pursuant to 10 CFR 50.54 (f) to certify under oath or affirmation, no later than 30 days from the date of this letter that: (a) the utility has in place and is implementing an Environmental Qualification (EQ) Program that will satisfy the requirements of 10 CFR Section 50.49 within the currently approved schedule for the plant without further extension; (b) the plant has at least one path to safe shutdown using fully qualified equipment, or has submitted a justification for continued safe operation (JCO) pending full qualification of any equipment not fully qualified; and (c) all other equipment within the scope of 50.49 is either fully qualified or a JCO has been submitted pending full qualification.

By Reference (2) we informed our project manager at NRC that we would use the date of our receipt of the Generic Letter as the start of the 30 days allowed to respond to the requirements.

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In response to the requirements in Generic Letter 84-24, Boston Edison states the following:

- a) Boston Edison cannot provide a certification as described in item (a) of Generic Letter 84-24 because we have requested by Reference (3) an extension until November 1985 to complete the environmental qualification of equipment listed in Attachment 1 of Reference (3) including the exemptions listed therein. Upon a favorable response to this request, Boston Edison expects to accomplish full compliance with the requirements of 10 CFR 50.49 by November 30, 1985. It is to be stressed that the preceding sentence is based upon the currently available information on each piece of equipment and our assessment may change as the qualification process is continued and further information is received.
- b) Boston Edison affirms that it has one path to safe shutdown using equipment which is either fully qualified or as to which BECo has submitted a justification for continued operation pending full qualification. This affirmation is based upon the equipment included in Boston Edison Equipment Qualification Master List Rev. 3 dated August 13, 1984. Any subsequent addition to the EQ Master List is not covered by this affirmation and will be addressed using 10 CFR 50.49 (h).
- c) Boston Edison affirms that all other equipment within the scope of 10 CFR 50.49 as identified by the Boston Edison Equipment Qualification Master List Rev. 3 dated August 13, 1984 is either fully qualified or a JCO has been submitted pending qualification. Also, we would state that any subsequent addition to the EQ Master List Rev. 3 will be addressed using 10 CFR 50.49 (h).

In addition, we note that we have recently completed an evaluation of 50.49 (b)(2) requirements based upon the methodology provided by your staff and have identified certain additional equipment not yet included in the EQ Master List Rev. 3, that should be qualified. This equipment is being integrated into the evaluation process with the final objective of qualification by November 30, 1985. This extension request is included in Reference (3).

Also, equipment covered under 10 CFR 50.49 (b)(3) (Regulatory Guide 1.97) is not governed by the schedule of 10 CFR 50.49 (g) and is not covered by the affirmation. Boston Edison has stated in Reference (4) as well as in its request for extension (Reference (3)) that equipment within the scope of 10 CFR 50.49 (b) (3) that is not included in the Boston Edison EQ Master List Rev. 3 will be qualified by schedules in the Regulatory Guide 1.97 submittal. Also, we would state that any subsequent addition to the EQ Master List Rev. 3 will be addressed using 10 CFR 50.49 (h).

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In response to the statement contained in the Generic Letter 84-24 that we should indicate the applicability of IE Bulletins and Notices listed in the Generic Letter 84-24, we state that we have examined these documents and have determined that all except IEB 82-04 and IEN 82-11 concern the equipment at Pilgrim Nuclear Power Station. Our ongoing evaluation will factor the applicable documents into the qualification process.

We would be pleased to answer any questions you may have regarding this letter.

Very truly yours,

W.D. Harrington

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: 4-14-89

Marion DeCamp
Notary Public