

**BOSTON EDISON**

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

Roy A. Anderson

Senior Vice President — Nuclear

October 23, 1992
BEC0 92-121

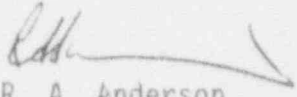
U. S. Nuclear Regulatory Commission
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License DPR-35
Docket 50-293

Proposed Technical Specification Change to Section 2.1,
Safety Limits; and Section 3.3.C, Scram Insertion Times

Boston Edison proposes the attached changes to Section 2.1, Safety Limits, and Section 3.3.C, Scram Insertion Times, of the Pilgrim Nuclear Power Station Technical Specifications in accordance with 10CFR50.90. The change to the Safety Limit section is being proposed to reflect the use of the advanced GE-10 fuel design in cycle 10. The change to the scram insertion times is being proposed to correct an error in the control rod scram insertion time corresponding to 90% insertion.

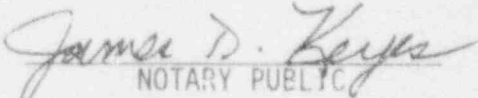
The requested changes are described in Attachment A, the proposed Technical Specification pages are in Attachment B, and the current Technical Specification pages marked up to indicate the requested revisions are in Attachment C.


R. A. Anderson

Commonwealth of Massachusetts)
County of Plymouth)

Then personally appeared before me, Roy A. Anderson, who being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My commission expires: MARCH 25, 1999
DATE


NOTARY PUBLIC

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cc: See Page 2

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Pilgrim Nuclear Power Station

PROPOSED CHANGE:

The proposal to change the Minimum Critical Power Ratio (MCPR) Safety Limit from 1.04 to 1.07 reflects the decision to use GE8x8NB-3 fuel elements in operating cycle 10 which is expected to begin June 1993. The current MCPR safety limit was based on Amendment 14 to GESTAR-II (NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel"). The proposed MCPR Safety Limit is based on NEDE-31152P, Revision 2, "GE Fuel Bundle Designs", that is referenced in Revision 10 to GESTAR-II. The proposed change to the Scram Insertion Times corrects the specified value for 90% insertion.

REASON FOR CHANGES:MCPR Safety Limit

The proposed change to Minimum Critical Power Ratio Safety Limit reflects the decision to use GE8x8NB-3 fuel in cycle 10. The proposed Safety Limit is based on NEDE-31152P, Revision 2, "GE Fuel Bundle Designs", that is referenced in Revision 10 to GESTAR-II.

Scram Insertion Times

The proposed change to the scram insertion time requirements is intended to correct the specified value for 90% insertion. The value currently specified in Section 3.3.C.2 is 5.30 seconds. This value is appropriate for a BWR/2, while the value appropriate for PNPS, a BWR/3, is 3.71 seconds.

A review of all scram time data, beginning with December 1972 data, up to and including the most recent data obtained in August 1991 was conducted. The review concluded the correct value of 3.71 seconds for 90% insertion was never exceeded. We have revised our operating procedures. The proposed change corrects the inconsistency between the PNPS Technical Specifications and our operating procedures.

DETERMINATION OF NO SIGNIFICANT HAZARDS

The Code of Federal Regulations requires the Licensee to provide to the Commission its analysis concerning the issue of significant hazards. Therefore, the following analysis has been performed in accordance with 10CFR50.91 and 10CFR50.92:

Section 2.1 - Safety Limits

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because derivation of the proposed MCPR Safety Limit uses an NRC-approved methodology and the same criteria presented in the current Technical Specifications. Equivalent fuel cladding protection (99.9 percent of all fuel rods do not experience transition boiling following a design basis transient) is provided.

2. The operation of Pilgrim Station in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change does not affect the function of any structure, system or component.
3. The operation of Pilgrim Station in accordance with the proposed amendment will not involve a significant reduction in a margin of safety because the utilization of current General Electric fuel designs provides an equivalent margin of safety. As stated previously, equivalent fuel cladding protection is provided and ensures 99.9 percent of all fuel rods will not experience transition boiling following a design basis transient.

Section 3.3.C - Scram Insertion Times

1. The operation of Pilgrim Station in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. The corrected value requires a faster (more conservative) Scram Insertion Time.
2. The operation of Pilgrim Station in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated because no physical modifications are associated with the proposed change and it does not affect the function of any structure, system or component.
3. The operation of Pilgrim Station in accordance with the proposed amendment will not involve a significant reduction in a margin of safety. The margin of safety will be increased.

These changes have been reviewed and recommended for approval by the Operations Review Committee and reviewed by the Nuclear Safety Review and Audit Committee.

Schedule of Change:

Approval of this change is requested by March 31, 1993. We also request the effective date of the MCPR Safety Limit change coincide with startup following Refueling Outage #9, currently scheduled for May 29, 1993. Appropriate changes to the Core Operating Limits Report will also be made prior to start up from Refueling Outage #9.