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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

May 14, 1985
BECo 85-087
Proposed Change 85-06

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: Radiological Effluent and Environmental Monitoring Technical Specifications (RETS)

Dear Sir:

Pursuant to Section 50.90 of the Commission's Rules and Regulations, Boston Edison Company hereby proposes the following modifications to Appendix A of the Operating License. This submittal replaces and voids proposals contained in Boston Edison letters dated February 21, 1979, July 2, 1979 and April 15, 1983.

Proposed Change

Reference is made to Operating License No. DPR-35 and the Technical Specifications contained in Appendix A. The proposed changes are contained in the pages of Attachment B of this submittal, and whose disposition is described below:

Replace pages in kind:

Table of Contents: ii, iii

Definitions: 5a

Other: 43, 44, 56, 64, 72, 76, 77, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 223, 223a

Remove and do not replace:

179a, 179b, 183a, 183b, 183c, 183d, 185a, 185b, 185c, 185d, 187a, 187b, 187c, 187d, 191a, 191b, 223b

A009
1/40

Add new pages:

Definitions: 5b

Other: 193a, 193b, 193c, 193d, 193e, 193f, 229 thru 249

Reason for Change

The proposed changes respond to NRC requests that Boston Edison amend Pilgrim Station's Operating License. These requests were contained in letters dated July 11, 1978 and November 15, 1978. We initially responded by submitting a proposed change February 21, 1979.

Subsequent discussions between Boston Edison and the NRC resulted in a variety of changes which were incorporated into an April 15, 1983 submittal.

A review meeting of the April 15, 1983 submittal was held at Pilgrim Station starting on June 7, 1984. The attached submittal again revises BECo's proposed changes and is the result of the June '84 meeting with the NRC. This submittal supersedes in its entirety that of April 15, 1983.

Safety Considerations

The proposed technical specifications are intended to implement the following Federal Regulations; 10CFR50.34a(a), 10CFR50.36a, 10CFR20, 10CFR50, Appendix A, General Design Criteria 60 and 64, and 40CFR190.

These changes have been reviewed by the Nuclear Safety Review and Audit Committee (NSRAC) and reviewed and approved by the Operations Review Committee (ORC).

Safety Hazards Consideration

The Commission has provided guidance for the application of the standards for determining whether a significant hazards consideration exists by providing examples of amendments that are considered not likely to involve significant hazards considerations (48 FR 14870). One such amendment involves 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.

The change proposed by BECo is intended to implement 10 CFR 50.34(A); 10 CFR 50.36 (A); 10 CFR 20; 10 CFR 50, Appendix A, General Design Criteria 60 and 64, and 40 CFR 190. This amendment, therefore, reflects changes to make the Pilgrim license conform to changes in the regulations. Since BECo is presently obligated by these regulations to control and limit offsite releases of radioactive materials to levels which are as low as is reasonably achievable, this license change will only result in very minor changes to facility operations which are clearly in keeping with the regulations.

Therefore, since the application for amendment involves proposed changes that are similar to the examples for which no significant hazards consideration exists, BECo has made a proposed determination that the application for amendment involves no significant hazards consideration.

Schedule of Change

We request that these changes become effective 180 days after receipt of NRC approval. This is to allow adequate time to modify affected procedures and to provide operator training, thereby ensuring proper implementation.

Fee Determination

The major portion of the proposed change is an extension of the 10CFR Part 50, Appendix I design study submitted to the USNRC on June 2, 1976, and constitutes completion of the requirements of Appendix I for the submittal of technical specifications. Since fees were not applicable when the requirements put forth by Appendix I to 10CFR Part 50 became effective, and since the submittal of this has been delayed to allow the receipt and assimilation of guidance from the NRC, we believe that this amendment is exempt from any fees defined in 10CFR Part 170.12(c).

Additional Information

(1) We have provided justification for our revisions concerning items of Standard RETS not applicable to Pilgrim. These items are contained in Attachment A.

(2) We have implemented a new section of technical specifications (Section 7), titled "Operational Objectives." The technical specifications selected for insertion into this section were carefully reviewed against our definition of Limiting Condition of Operation (LCO) and determined to

be outside the intent of this definition. Thus by placing them into the operational objective section we have preserved the regulatory aspect of the technical specification yet lessened the potential impact on operations.

Very truly yours,

W D Harrington

GGW/ns

Attachment A: Justifications for Revisions from STS not addressed

Attachment B: Proposed Radiological Effluent and Environmental Monitoring Technical Specifications (RETS)

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: November 10, 1989

Mary Elizabeth D Stanton
Notary Public

ATTACHMENT "A"

JUSTIFICATION FOR PNPS REVISED RETS NOT ADDRESSING CERTAIN ITEMS IN STANDARD TECHNICAL SPECIFICATIONS (STS) FOR BWRs

BWR-STS ITEMS NOT ADDRESSED	JUSTIFICATION
I. 1.0 DEFINITIONS	
A. 1.30 Process Control Program (p. 1-2).	PNPS does not have a Process Control Program (PCP) as defined in Standard Technical Specifications. The methods used to accomplish the processing and packaging of solid radioactive waste material are procedurally addressed. These procedures are required by T.S. Section 6.8 and are reviewed and approved by the ORC per T.S. Section 6.5.A.6.
B. 1.31 Solidification (p. 1-3).	This definition applies to the Process Control Program which PNPS does not have.
C. 1.34 Ventilation Exhaust Treatment System (p. 1-3).	Not applicable to PNPS as a system during normal operations.
II. 3 4.11 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS	
A. LIQUID EFFLUENTS - INSTRUMENTATION	
1. 3.3.7.11, Table 3.3.7.11-1, #2 - Gross Radioactivity Monitors not providing automatic termination of release, plus ACTION 112 (p. 3/4 3-75).	PNPS does not have these monitors. Therefore, grab samples will be obtained and analyzed on a weekly basis.
2. 3.3.7.11, Table 3.3.7.11-1, #5 - Tank Level Indicating Devices (for tanks outside plant buildings) (p. 3/4 3-74).	PNPS does not have any temporary tanks outside of plant buildings. The only outside tanks are Condensate Storage Tanks and Fire Water Storage Tanks. This item is not meant to address the CSTs or Fire Water Storage.
3. 3.3.7.11, Table 4.3.7.11-1 #1 - Gross Radioactivity Monitoring Providing Alarm and Automatic Termination of Release (pg 3/4 3-76).	The instruments that provide this monitoring which have been in use at PNPS since startup (1972) do not have built-in source checks. Therefore, this surveillance does not apply (NA).
4. 3.3.7.11, Table 4.3.7.11-1, #2 - Gross Beta or Gamma Radioactivity Monitors Providing Alarm but not providing automatic termination of release (p. 3/4 3-76).	PNPS does not have these monitors. Therefore, a grab sample will be obtained and analyzed on a weekly basis.
5. 3.3.7.11, Table 4.3.7.11-1, #5 - Tank Level Indicating Devices (for tanks outside the building) (p. 3/4 3-77).	PNPS does not have any tanks outside the buildings other than the Condensate Storage Tanks and Fire Water Storage.

BWR-STS ITEMS NOT ADDRESSED	JUSTIFICATION
B. GASEOUS EFFLUENTS - INSTRUMENTATION	
1. 3.3.7.12, Table 3.3.7.12-1, #1 - 2A & 2B - Main Condenser Offgas Treatment System (p. 3/4 3-60).	This system is tied into the Main Stack effluent pathway.
2. 3.3.7.12, Table 4.3.7.12-1, #6 - Auxiliary Building Ventilation Monitoring System, and #7, Fuel Storage Area Ventilation Monitoring System (p. 3/4 3-67).	These building ventilation monitoring systems are not applicable to PNPS.
3. 3.3.7.12, Table 4.3.7.12-1, #8 - Radwaste Area Ventilation Monitoring System, and #9 - Turbine Gland Seal Condenser Vent and Mechanical Vacuum Pump Exhaust Monitoring System (p. 3/4 3-67).	The Radwaste Area is tied into the Reactor Building Vent, and Turbine Gland Seal Condenser ventilation is tied into the Main Stack effluent Pathway.
C. LIQUID WASTE TREATMENT	
1. 3.11.1.4, Liquid Holdup Tanks.	PNPS currently does not have, nor expects to have, temporary liquid holdup tanks outside of the plant.
D. GASEOUS EFFLUENTS - DOSE RATE	
1. 3.11.2.1, Table 4.11-2, A - Waste Gas Storage Tank, and B - Containment Purge (p. 3/4 11-9).	Waste Gas Storage Tank and Containment Purge are not applicable to PNPS.
2. 3.11.2.1, Table 4.11-2, Table Notation, #e (p. 3/4 11-9).	Not applicable to PNPS.
E. GASEOUS RADWASTE TREATMENT	
1. 3.11.2.5, Ventilation Exhaust Treatment (p. 3/4 11-15).	Ventilation Exhaust Treatment is not applicable to PNPS as a system during normal operations.
2. 3.11.2.6, Explosive Gas Mixture (Systems designed to withstand a hydrogen explosion) (p. 3/4 11-16).	This system is not applicable to PNPS.
3. 3.11.2.8, Mark I or II Containment (Optional) (p. 3/4 11-19).	This item is optional.
F. SOLID RADIOACTIVE WASTE	
1. 3.11.3, Process Control Program (p. 3/4 11-21).	PNPS does not have a Process Control Program.

BWR-STS ITEMS NOT ADDRESSED			JUSTIFICATION
III.	BASES		
A.	3/4.11.1.4	Liquid Holdup Tanks	PNPS does not have, nor expects to have, temporary liquid holdup tanks outside of the plant.
B.	3/4.11.28	Mark I or II Containment (Optional)	This item is optional.
C.	3/4.11.3	Solid Radioactive Waste	PNPS does not have a Process Control Program.
IV.	ADMINISTRATIVE CONTROLS		
A.	6.5.1.6.1	ORC Review	PNPS does not have a Process Control Program. Audits of the radiological monitoring program and Reg. Guide 4.1 are encompassed under existing specification 6.5.B.8.5. The ODCM will be included as a reference in the audit scope of the radiological monitoring program.
	6.5.2.8.K-n	NSRAC Review	
	6.13	Process Control Program	
V.	REPORTING REQUIREMENTS		
B.	6.9.C.2	Annual Radiological Environmental Monitoring Report.	The Annual Radiological Environmental Monitoring Report will not include comparisons to the preoperational studies. Unfortunately, the preoperational environmental study results for PNPS are too general for a meaningful comparison to current environmental program results.
VI.	RADIOLOGICAL ENVIRONMENTAL MONITORING		
	3/4.12.3	Interlaboratory Comparison Program.	PNPS does not analyze environmental media. Analysis of PNPS environmental media is conducted by the Yankee Atomic Environmental Laboratory (YAEL). YAEL participates in an interlaboratory comparison program with the EPA, and this information is available to the NRC upon inspection.