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May 8, 1981

BECo. Ltr. #81-92

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

License No. DPR-35
Docket No. 50-293

Response to NUREG-0737 Items II.K.3.16 and II.K.3.18

Reference A: BWR Owners Group (D. B. Waters) to
NRC (D. G. Eisenhut), "BWR Owners'
Group Evaluations of NUREG-0737 Re-
quirements II.K.3.16 and II.K.3.18",
dated March 31, 1981

Dear Sir:

Reference A, submitted by the BWR Owners' Group, contained feasibility studies on
Items II.K.3.16 "Reduction of Challenges and Failures of Relief Valves" and II.K.3.18
"Modification of Automatic Depressurization System Logic". Attached please find
Boston Edison Company's position relative to these studies.

Should you desire additional information or clarification on this subject, please
feel free to contact us.

Very truly yours,

A. V. Morisi

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II.K.3.16

The Reference A study identifies the reduction of Stuck Open Relief Valve (SORV) events as the intent of the NUREG item and presents various methods of reducing the likelihood of such events, i.e. reducing challenges to S/RVs, reducing causes of spurious blowdowns and reducing the probability of S/RVs to stick open when challenged. Based on this information, we believe that a substantial reduction (by an order of magnitude) in the incidence of SORVs is possible at Pilgrim Station via the following methods:

- 1.) Change top works of the three stage Target Rock valves to two stage.

Comment - This change has already been made at Pilgrim.

- 2.) Low-Low set relief or equivalent manual actions

Comment - Current Station operating procedures call for manual opening of a relief valve under conditions which are likely to cause auto actuation and the BWR Emergency Procedure Guidelines, when implemented, will provide further assurance of reducing the total number of S/RV challenges by limiting the second and subsequent opening of the S/RVs to meet the intent of the Low Low set valve.