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May 28, 1985
BECO 85-101

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

NUREG 0737, Item II.B.3, II.F.1.2,
II.F.1.6, III.D.3.4

Dear Sir:

This submittal is made to conclude Technical Specification issues stemming from modifications associated with NUREG 0737 and the suggested Technical Specifications of Generic Letter 83-35 (GL 83-36).

II.B.3 and II.F.1.2

GL 83-36 suggested a single Administrative Technical Specification to address both II.B.3 and II.F.1.2. This suggested Technical Specification would state, in brief, that a program consisting of station procedures would exist for the operation, maintenance, and personnel training associated with the obtaining and analyzing of reactor coolant and containment atmosphere under accident conditions.

Boston Edison does not believe the addition of such a Technical Specification is necessary. Pilgrim's Facility Operating License, DPR-35, was amended on December 17, 1984 to incorporate a license condition, 3.I, which states:

The licensee shall complete the installation of a post-accident sampling system and a containment atmospheric monitoring system as soon as practicable, but no later than June 30, 1985.

Section 6.8.A of Pilgrim Technical Specifications states, in part:

Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33, ...

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Boston Edison believes that the objective of the suggested Technical Specification (GL 83-36) is already adequately addressed because the ability to sample containment atmosphere and reactor coolant is assured by license condition 3.I. This license condition, in turn, assures that procedures and training will be implemented because of the need to satisfy Technical Specification 6.8.A, the related ANSI standard N18.7-1972, and Regulatory Guide 1.33.

The various isolation valves resulting from PASS will be part of our "Appendix J" submittal, expected to be sent to NRC in the near future. We believe that after the incorporation of the PASS isolation valves into Technical Specifications no further Technical Specification changes will be necessary for II.B.3 and II.F.1.2.

II.F.1.6

By letter of April 11, 1985, Boston Edison stated that Amendment #55 satisfied GL 83-36 concerning II.F.1.6. No further Technical Specification action by Boston Edison is believed necessary on II.F.1.6.

III.D.3.4

By letter of June 24, 1982, NRC accepted Boston Edison's position that toxic detectors were not necessary to ensure control room habitability. No toxic detectors are installed, therefore no Technical Specification changes are necessary.

We believe this and our submittal of August 9, 1984 satisfies GL 83-36 for Pilgrim. Should you wish further information on this issue, please contact us.

Very truly yours,

W D Harrington

PMK/kmc