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May 28, 1985

BECO 85-100

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.K.3.22: Automatic
Switchover of Reactor Core Isolation
Cooling System Suction

Dear Sir:

By letter dated November 18, 1983, Boston Edison Company (BECO) modified its previous position on Item II.K.3.22 by committing to provide an automatic suction switchover capability for the Reactor Core Isolation Cooling (RCIC) System.

This modification was to reduce reliance on operator action during an event where RCIC suction needed to be switched from its primary coolant supply, the Condensate Storage Tanks (CST), to the auxiliary source, the Torus.

In preparing to implement this modification, we re-examined its basis not only in light of Pilgrim Station, but against the relief granted to Browns Ferry in an NRC letter dated July 27, 1984.

Browns Ferry's relief was granted from II.K.3.22 on the grounds that automatic switchover is of marginal safety benefit because manual switchover is adequate due to the large amount of time available for operator action. This finding supports the position originally presented by BECO for not implementing the automatic switchover.

The condensate storage at Pilgrim consists of two tanks, each of which contains 275,000 gallons. This provides 550,000 gallons, out of which 150,000 is reserved for the RCIC and High Pressure Coolant Injection (HPCI) systems. The reserve volume is established by standpipes which provide suction from CST to other services.

Current operating and emergency procedures require the manual transfer of RCIC suction from the CST to the Torus if a low CST or high Torus level alarm is received. The low CST level alarms at 172,800 gallons. At the maximum RCIC system flow of 416 GPM, it would take approximately 6.9 hours of continuous RCIC pump operation at design capacity to deplete the condensate storage available after a low CST level alarm is received.

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Manual switchover, as described in PNPS procedures, is accomplished as follows: The operator acknowledges the CST low level alarm. Level indicators provide the operator with level verification. Two control switches allow the operator to remotely open two valves, which provides the RCIC pump suction from the Torus. An automatic interlock ensures cessation of RCIC suction from the CST by closing a valve when the valves for Torus suction are fully open. Valve position, suction and discharge pressure, and proper RCIC operation can all be determined from the control room.

Consequently, the operator has approximately 6.9 hours from alarm to perform a task which requires a few minutes. We believe that the large amount of time available to perform the manual switchover provides sufficient justification for PNPS not to implement the automatic suction switchover. Also, the addition of more hardware introduces another potential failure mechanism, and the addition of this feature to technical specifications could potentially reduce plant availability. Based on this, BECo believes that the cost involved for this modification is not justified by the marginal safety benefit such a change may provide.

BECo therefore believes that relief from implementing II.K.3.22 is justified and herein requests that relief. As you know, we have previously committed to this modification, and have incorporated it into our Long Term Program. Would you please, therefore, respond to this request expeditiously so that we may effectively plan our workload.

Should you require further information concerning this submittal, please contact us.

Very truly yours,

W D Harrington

PMK/kmc