

BOSTON EDISON COMPANY  
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WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

August 7, 1985

BECO 85-140

Dr. Harold Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

License DPR-35  
Docket 50-293

Subject: Compliance with the Anticipated Transients Without Scram, Final Rule, 10CFR50.62, Dated June 26, 1985

Reference: Fulton, JM to Denton, H., BWR Owners Group Letter on "Anticipated Transients Without Scram Technical Specifications 10CFR50.62", Letter No. BWROG-8527, dated July 16, 1985

Dear Sir:

Boston Edison Company, in conjunction with the BWR Owners Group, has been evaluating various alternatives for implementing the provisions of the subject Anticipated Transient Without Scram (ATWS) final rule. In evaluating the ATWS rule requirements, BECo has looked into the potential impact of the rule on the existing Technical Specifications (T.S.). The BECo and BWROG evaluations indicate that for the Standby Liquid Control System (SLCS), several alternative means of compliance with the 86 GPM equivalent control capacity become available based upon the impact of the rule on T.S. The referenced BWROG letter discusses the details of the potential impact of the rule on the existing T.S. BECo supports the BWROG position as delineated in that letter, and requests that NRC provide a quick resolution of the impact of the ATWS rule on existing T.S.

BECO is required to submit to the NRC an implementation plan and schedule for the ATWS modifications by October 15, 1985. In order to meet this schedule a determination by the NRC is required by August 15, 1985 or soon thereafter. Such determination by the NRC is a prerequisite for selecting a safe, reliable and cost-effective ATWS modification to meet the SLCS 86 GPM equivalent control capacity. BECo requires approximately 60 days to complete a plan and schedule after choosing a modification. This 60 day window is required to evaluate the lead time involved for procuring the required hardware and outage planning for the implementation of the modification. It is BECo's position not to proceed with modifications where uncertainties exist. Therefore, if the NRC determination is not available to us approximately 60 days in advance of ATWS rule response due date (i.e. October 15, 1985), BECo would find it necessary to seek exemption from the schedule requirements of 10CFR50.62(d).

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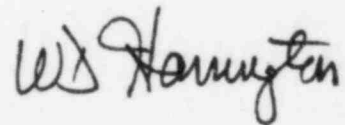
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BECO personnel discussed the potential impact of the ATWS rule on the existing SLCS T.S. with the NRC staff in September 1984 and, again on July 8, 1985. We respectfully wait to hear from the NRC.

Should you wish to have any further information regarding this letter, please contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "W.D. Harrington". The signature is written in a cursive, flowing style with a large, stylized "H".

cc: Mr. Domenic B. Vassallo, Chief  
Operating Reactors Branch #2