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A. L. OXSEN
VICE PRESIDENT
NUCLEAR OPERATIONS

August 9, 1985

BECO 85-147
Proposed Change 85-10

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

Proposed Change to Technical Specification
Table 3.1.1

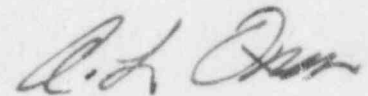
Dear Sir:

Pursuant to 10CFR50.90, Boston Edison Company hereby proposes the attached modification to Appendix A of Operating License No. DPR-35. This modification revises Table 3.1.1, "Reactor Protection System (SCRAM) Instrumentation Requirement", by changing a footnote at the Table's bottom, and by reinstating a footnote reference number which was inadvertently deleted in an earlier amendment.

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

Very truly yours,

PMK/kmc

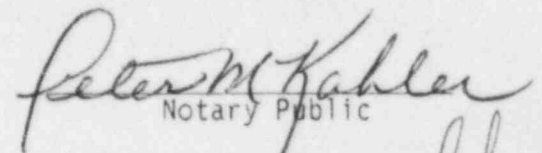


Attachment
One original and 39 copies

Commonwealth of Massachusetts)
County of Suffolk)

Then personally appeared before me A. L. Oxsen, who, being duly sworn, did state that he is Vice President - Nuclear Operations 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: *October 21, 1988*



Notary Public

cc: See next page

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BOSTON EDISON COMPANY

Mr. Domenic B. Vassallo, Chief
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cc: Mr. Robert M. Hallisey, Director
Radiation Control Program
Massachusetts Dept. of Public Health
600 Washington Street, Room 770
Boston, MA 02111

Proposed Change

Reference is made to Pilgrim Nuclear Power Station, Unit #1 Technical Specifications Appendix A, Table 3.1.1 "Reactor Protection System (SCRAM) Instrumentation Requirement".

Currently, the footnote associated with the APRM high flux scram setpoint states:

*APRM high flux scram setpoint $\leq (.65W + 55) \left[\frac{FRP}{MFLPD} \right]$ Two recirc pump operation.

This is to be changed to:

*APRM high flux scram setpoint $\leq (.58W + 62\%) \left[\frac{FRP}{MFLPD} \right]$ Two recirc pump operation.

The other proposed change is to place the note reference (13) in the "Trip Level Setting" column at the "APRM Inoperative" line.

Reason for Change

The change to the formula at the bottom of Table 3.1.1 is proposed to correct an oversight which occurred with Amendment #72. Amendment #72 changed the formula in PNPS Technical Specification 2.1.A.1.a (pages 6 and 7), and the APRM Scram Line of Figure 3.11-9 "Pilgrim Power/Flow Map" (page 205H). The formula should have been changed on Table 3.1.1 at that time.

The reinstatement of note reference (13) to Table 3.1.1 is to correct its inadvertent deletion which occurred in Amendment #15. Amendment #15 became effective May 21, 1976. At that time (13) was no longer on the page, probably due to a typographical error. Its reinstatement gives guidance to table users concerning APRM operability.

Safety Considerations

The change to the formula on page 27 is not of safety significance because it is administrative in nature. The proposal which became Amendment #72 was supported by NEDO-22198, and was found by NRC to present no unreviewed safety concerns or significant hazards.

Restoring reference to note (13) in Table 3.1.1 is also administrative in nature because its only purpose is to aid in locating the definition of APRM inoperability.

This proposed change has been reviewed and approved by the Operations Review Committee and reviewed by the Nuclear Safety Review and Audit Committee.

Significant Hazards Considerations

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 (48FR14870). One such amendment is a change which either may result in some increase in the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified: for example, a change resulting from the application of a small refinement of a previously used calculational model or design method. The change proposed to the APRM scram setpoint formula is such a change. Chapter 3 of the Pilgrim Final Safety Analysis Report (FSAR) describes the basic operating envelope within which normal reactor operations are conducted. Subsequent analyses were conducted to justify expansion of this operating region using refinements of previously employed calculational models.

The results of the analyses were reflected in the September 1982 Supplemental Reload Licensing Submittal for Cycle 6 and NEDO-22198. The formula change now being proposed therefore reflects the application of a small refinement of a previously used calculational model and as such involves a proposed change similar to examples for which no significant hazards consideration exists.

Another example of an amendment which would not be considered likely to involve significant hazards considerations is a purely administrative change: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature. The proposed reinstatement of note reference (13) to Table 3.1.1 is such a change because it corrects a previous error, the unintentional deletion of note reference (13) during an earlier emendation.

Therefore, since this application for amendment involves proposed changes that are similar to the examples for which no significant hazards consideration exists, Boston Edison proposes that a determination should be made by the NRC that this application for amendment involves no significant hazards consideration.

Schedule of Change

This change will be effective 30 days after receipt of the Commission's approval.

Fee Determination

Pursuant to 10 CFR 170.12(c) this submittal includes a check for \$150.00 in payment of the application fee.