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A. L. OXSEN
VICE PRESIDENT
NUCLEAR OPERATIONS

August 9, 1985

BECO 85-146
Proposed Change 85-09

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

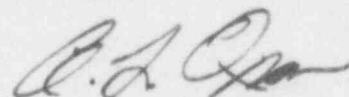
Proposed Technical Specification Change on
SBGTS and CRHEAF

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 sections concerning the Standby Gas Treatment System and the Control Room High Efficiency Air Filtration System. These changes modify our submittal of August 9, 1984, and are proposed to reflect a design change to the system and add clarity to the existing Technical Specifications.

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

Very truly yours,



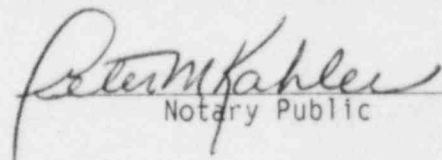
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Attachment
One original and 39 copies

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
August 9, 1985
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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 Station Operating License No. DPR-35, pages 158, 158A and 158C. By letter of August 9, 1984, Boston Edison (BECO) submitted proposed changes to these pages, as well as to other pages associated with the Standby Gas Treatment System (SBGTS) and the Control Room High Efficiency Air Filtration System (CRHEAF).

Plant Design Change (PDC) 84-20 subsequently modified the SBGTS, which made necessary a change to technical specification 4.7.B.1.a.(2.). In addition, a recommendation was made that technical specification 3.7.B.1.c and 3.7.B.2.c be changed to make their wording consistent.

This proposed change addresses both issues, and is submitted as an emendation of our August 9, 1984 submittal. As such, please substitute the attached Pages 158, 158A and 158C for those in our previous submittal.

Currently, Technical Specification (TS) 4.7.B.1.a.(2.) states, in part:

Perform an instrument function test on the humidistats controlling the heaters.

The proposed change deletes this requirement because the humidistats have been permanently bypassed.

Our August 9, 1984 proposed Technical Specification (TS) 3.7.B.1.c states:

From and after the date that one train of the Standby Gas Treatment System is found to be inoperable for any reason, continued reactor operation, irradiated fuel handling or new fuel handling over the spent fuel pool or core is permissible during the succeeding seven days providing that within two hours, and daily thereafter, all active components of the other Standby Gas Treatment train shall be demonstrated to be operable.

We are emending this change to 3.7.B.1.c by deleting "... and daily thereafter, ..."

The third proposed change concerns TS 3.7.B.2.c, which currently states, in part:

From and after the date that one train of the Control Room High Efficiency Filtration System is made or found incapable of supplying filtered air to the control room for any reason, reactor operation or refueling operations are permissible only during the succeeding 7 days.

The proposed amendment would provide an additional requirement to the above, consistent with the proposed 3.7.B.1.c, which would state:

...providing that within two hours all active components of the other CRHEAF train shall be demonstrated operable.

A fourth change concerns 4.7.B.2.c, which currently states:

At least once every 18 months demonstrate the operability of the heaters at rated power.

The proposed change shall state:

At least once every 18 months demonstrate the ability of the heaters to perform their design function.

Reason for Change

The humidistats associated with the SBGTS heaters were determined to be not qualified, in accordance with IE Bulletin 79-01B, for the environment in which they would exist during certain postulated events. Qualified replacements are not available, and it was determined that humidistats are not essential to the proper operation of the system.

The wording being added to 3.7.B.2.c is proposed at the suggestion of NRC. It makes 3.7.B.2.c consistent with 3.7.B.1.c, which is associated with a similar system, and provides a clear description of the appropriate actions to be taken when one train of CRHEAF is incapable of performing its designed function.

Safety Considerations

The proposed change to 4.7.B.1.a does not compromise safety because the purpose of the humidistats, which are relative humidity sensors intended to control the relative humidity (RH) of the incoming gas stream by energizing the SBGTS heaters, is not essential. The humidity will continue to be adequately controlled by the SBGTS heaters, which will now be energized when the exhaust fans are energized. The heaters are protected from overheating by high temperature sensors, which deenergize the heaters prior to temperatures which could imperil the charcoal beds. Therefore, the system is capable of performing its designed function without the humidistats, and because of the unavailability of qualified humidistats, bypassing them enhances assurance of proper heater operation. This bypassing, of course, removes the need to test the humidistats, and the need to have such a surveillance test in 4.7.B.1.a. The removal of this test is not a safety concern.

The change to 3.7.B.1.c does not compromise safety because once the redundant train has been demonstrated operable there is reasonable assurance it will perform its designed function while the inoperable train is being repaired. Daily testing does not necessarily add to that assurance because excessive testing may degrade the equipment.

The change to 3.7.B.2.c enhances safety in that it requires further testing of the operable train of CRHEAF when one train is inoperable, which provides additional assurance that that train will be available if called upon.

The change to 4.7.B.2.c is made to remove ambiguity. "Rated power" could be misinterpreted to mean rated reactor power. This, of course, is not meant. It is intended that the heaters be tested at a predetermined value such that they will control humidity to protect the charcoal beds from degradation.

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 Consideration

The Commission has provided guidance for the application of the standards for determining whether a significant hazards consideration exists by providing examples of amendments not likely to involve significant hazards considerations (48FR14870). One such amendment involves a change that corresponds to section (vi) of 48FR14870 in that the change may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but the results of the change are clearly within all acceptable criteria.

Excessive humidity in the SBGTS could reduce the effectiveness of the charcoal beds in filtering out radioiodines from gaseous effluents during an accident. In the past, humidity was measured by the humidistats, which activated heaters at the appropriate setpoint to remove humidity and thereby preclude degradation of the beds. The bypassing of the humidistats does not constitute a significant hazard because the ability to remove humidity is ensured by the heaters, which are now made operational whenever the SBGTS fans are turned on. Heater dependability and life are maintained by overtemperature switches, which protect the heaters and the charcoal beds from degradation caused by excessive heat. Since the objective of SBGTS humidity control can be achieved without the humidistats, and since the humidistats cannot be qualified, their being bypassed does not degrade, but enhances the assurance that the SBGTS will perform its designed function.

Section (vi) is also applicable to removing the daily surveillance of the redundant SBGTS train when a train is found or made inoperable. While at first this may seem to slightly reduce confidence in SBGTS availability, such a reduction is countervailed by the lessening of surveillance induced degradation of system components.

In the case of adding a further restriction to 3.7.B.2.c, no significant hazards consideration exists because adding initial testing of active components of the operable train of the CRHEAF provides greater assurance that that train will perform its designed function if required to when the redundant train is made or found inoperable. This corresponds to example (ii) of 48FR14879 in that it constitutes an additional limitation, restriction, or control not presently included in the subject technical specification. Specifically, it is a more stringent surveillance requirement.

The rewording of 4.7.B.2.c is similar to section (i) of 48FR14870 in that it represents a change in nomenclature, and is therefore an administrative change. Existing CRHEAF heater testing frequency and methodology will not be changed. This change is proposed to avoid potential misinterpretation caused by the connotation of "rated power" in nuclear parlance.

For the reasons discussed above, the changes proposed herein do not require the application of a significant hazards consideration because the operation of Pilgrim Nuclear Power Station in accordance with these proposed changes would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

Schedule of Change

This change will become effective 30 days following BECo's receipt of approval by the Commission.

Fee Determination

Pursuant to 10 CFR 170.12(c), an application fee of \$150.00 was provided with our August 9, 1984 submittal. Since this submittal is an emendation of that submittal, and since review of the August 9, 1984 submittal has not commenced, we believe no additional application fee is necessary.