

January 31, 1997

E. Thomas Boulette, Ph.D.  
Boston Edison Company  
Pilgrim Nuclear Power Station  
RFD #1, Rocky Hill Road  
Plymouth, MA 02360-5599

SUBJECT: 10 CFR 50.54(p) SUBMITTAL FOR PILGRIM NUCLEAR POWER STATION

Dear Mr. Boulette:

This letter is in response to your correspondence of April 3, 1996 regarding changes to the Pilgrim Nuclear Power Station Guard Training and Qualification Plan identified as Revision 10, submitted under the provisions of 10 CFR 50.54(p).

Based on your determination that the changes do not decrease the overall effectiveness of your security plan and after limited review of the changes, no NRC approval is required for some of the changes, in accordance with 50.54(p). Implementation of these changes will be subject to inspection to confirm that the changes have not decreased the overall effectiveness of your security plan.

However, one change appears to be inconsistent with the criteria of 10 CFR 50.54(p). That change involves the definition of Annual that was added to Appendix A of the Plan. Your definition states "Annual - Each requirement shall be performed within the specified interval with a maximum allowable extension not to exceed 25% of the specified interval."

To provide reasonable flexibility consistent with that existing in technical specifications (tech specs), we will approve the use by licensees of generic surveillance requirements for periodic testing as found in Section 4.0.2(a) and (b) of generic tech specs. These specifications are incorporated in the operating licenses in the same manner as our security plans, and are authorized in 10 CFR 50.34(b)(6)(vi) and 10 CFR 50.36(b).

The acceptable language contained in the above reference is as follows:

"Each surveillance requirement shall be performed within the specified time interval with:

- a. A maximum allowable extension not to exceed 25 percent of the surveillance interval, but
- b. The combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval."

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You should follow your previously approved plan with respect to the requirements to perform certain requirements annually until you resubmit a plan revision to reflect the above language.

The enclosure to your letter contained Proprietary Information of a type specified in 10 CFR 2.790 and will be withheld from public disclosure. In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter will be placed in the NRC Public Document Room.

Mr. Gregory Smith was the reviewer for this matter. Should there be any questions, he can be contacted at (610) 337-5263.

Sincerely,

ORIGINAL SIGNED BY:

Richard R. Keimig, Chief  
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Docket No.: 50-293

cc:

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