



10CFR50.55a

**Boston Edison**

Pilgrim Nuclear Power Station  
Rocky Hill Road  
Plymouth, Massachusetts 02360

**E. T. Boulette, PhD**  
Senior Vice President - Nuclear

February 5, 1997  
BECo Ltr. #2.97.010

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Docket No. 50-293  
License No. DPR-35

WITHDRAWAL OF PILGRIM REFUELING OUTAGE (RFO) #11  
ISI RELIEF REQUESTS #1 AND #2 (ASME SECTION XI INSPECTIONS)  
AND REVISION TO THE RFO #11 ISI PLAN SCOPE

- References:
1. BECo Letter No. 96-105, dated December 12, 1996
  2. BECo Letter No. 97-003, dated January 20, 1997
  3. BECo Letter No. 96-091, dated October 30, 1996

Boston Edison Company (BECo) requested relief from RFO #11 inservice inspection (ISI) examinations (Reference 1) to avoid unnecessary exposure due to elevated radiation levels in the drywell. The letter requested relief from ASME Section XI inspections related to nozzle-to-reactor pressure vessel welds (Relief Request #1), ASME Class I piping welds (Relief Request #2), and Generic Letter 88-01 Intergranular Stress Corrosion Cracking (IGSCC) related examinations (Relief Request #3). The letter stated that we planned to implement chemical decontamination of the recirculation system during RFO #12, and the deferred ISI examinations were to be completed during RFO #12 after the decontamination and dose reduction strategies were implemented.

Subsequently, we informed the NRC (Reference 2) that we decided to perform chemical decontamination of the recirculation system piping during RFO #11. The chemical decontamination project has unexpectedly increased the outage scope and complexity of scheduling of additional tasks in RFO #11. As such, we are adopting the ASME Section XI, Subarticle IWB-2412(b) allowed extension of the inspection period by one year, such that the current inspection period will now end on June 30, 1999. The extended inspection period will include both RFO #11 and RFO #12. This allows us to transfer the ISI examinations covered by Relief Requests #1 and #2 to RFO #12 as allowed by the ASME code percentages specified in ASME Section XI, Table IWB-2412-1. Thus, by adopting the ASME code allowed extension to the inspection period, Relief Requests #1 and #2 become unnecessary. Accordingly, BECo

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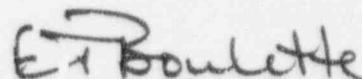
hereby withdraws them. This withdrawal was discussed with the NRC staff on January 31, 1997.

Relief Request #3 relates to the IGSCC examinations of Category D N2A and N2B nozzle safe-end welds. The inspection frequency for Category D welds is governed by Generic Letter 88-01 and not by the ASME code. Therefore, we still require NRC approval of Relief Request #3. The reason for this request remains the same, to avoid unnecessary radiation exposure.

The examination of nozzles N2A and N2B safe-ends requires partial removal of shield blockouts, which otherwise would be fully removed for the ASME code required examinations of N2A and N2B nozzle-to-vessel welds and inner radius area. Since these ASME code required examinations of N2A and N2B welds will be performed in RFO #12, we wish to defer the Category D safe-end weld inspections of those nozzles to RFO #12 as well. This will allow us to save dose since shield blockouts would need to be removed and reinstalled once instead of twice. As explained in Reference 1, approximately 60 man-rem dose can be avoided by performing both Generic Letter 88-01 and ASME code required examinations for nozzles N2A and N2B and class 1 piping welds in RFO #12. Accordingly, we request the NRC approve Relief Request #3 expeditiously and issue the safety evaluation before RFO #11 starts on February 15, 1997.

We have extended the inspection period for ASME code required inspections. The RFO #11 ISI inspection plan (Reference 3) is hereby amended to exclude the ASME code inspections covered by Relief Requests #1 and #2. These ISI inspections will now be performed during RFO #12. Should the NRC grant approval to defer the safe-end welds to RFO #12, our RFO #11 inspection plan will change accordingly and all examinations described in Relief Requests #1, 2 and 3 will be included in the RFO #12 ISI scope.

If you have any questions regarding the information contained in this letter, please contact Walter Lobo at (508) 830-7940.



E. T. Boulette, PhD

PMK/WGL/dmc/rfoisi6

cc: Mr. Alan B. Wang, Project Manager  
Project Directorate I-1  
Office of Nuclear Reactor Regulation  
Mail Stop: 14B2  
U. S. Nuclear Regulatory Commission  
1 White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Senior Resident Inspector  
Pilgrim Nuclear Power Station