

BOSTON EDISON COMPANY  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

November 25, 1985  
BECO 85-212

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

License DPR-35  
Docket 50-293

Reference A: Boston Edison Company letter (W. D. Harrington) to  
NRC (D. B. Vassallo), dated June 4, 1984

Dear Sir:

The purpose of this letter is to request relief from the visual examination requirements of Generic Letter (GL) 84-11. GL 84-11, Attachment 1, Section E states:

"A visual examination for leakage of the reactor coolant piping shall be performed during each plant outage in which the containment is de-inerted. The examination will be performed consistent with the requirements of IWA-5241 and IWA-5242 of the 1980 Edition of Section XI of the ASME Boiler and Vessel Code. The system boundary subject to this examination shall be in accordance with IWA-5221."

At the time GL 84-11 was issued, Boston Edison Company was also subject to "IGSCC Inspection Order Confirming Shutdown" (Order), dated August 26, 1983 for Pilgrim Station. Section III.A.3 of the Order contains essentially the same requirements as GL 84-11 for leak detection through the use of visual examinations. In our required response (Reference A) to GL 84-11 we committed to use the Order's interim measures (Section III.A) as guidelines for the preparation of a technical specification amendment on leak detection. A proposed technical specification amendment was submitted on February 4, 1985.

The NRC acknowledged our response to GL 84-11 in NRC Letter (H. R. Denton to W. D. Harrington) dated December 4, 1984. However, you imposed the additional requirement that all of the guidance contained in GL 84-11, Attachment 1 was to be followed until our technical specification amendment request was approved by your staff.

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At the time this requirement was imposed, BECo did not foresee: (1) that the time required for approval of our technical specification amendment would exceed a year, and (2) the number of times in which the unit would be shutdown and the requirements of GL 84-11 imposed, especially after having just performed such an examination at the end of Refuel Outage No. 5. Therefore, BECo requests relief from this requirement with respect to the frequency for performing the visual examinations. In lieu of the present requirement we are proposing that a visual examination for leakage of the reactor coolant piping be performed during each plant outage in which the containment is de-inerted, unless such an inspection has been performed during the previous 92 days. The examination will be performed consistent with the requirements of IWA-5241 and IWA-5242 of the 1980 Edition of Section XI of the ASME Boiler and Pressure Vessel Code. The system boundary subject to this examination will contain the susceptible welds inside the primary containment.

Crack growth that could occur during a 92-day interval would be small when compared to the margin between the point at which detectable leakage will occur and the point of net section collapse. In addition, performing these visual inspections in accordance with the revised frequency will minimize unnecessary personnel radiation exposure. Personnel exposure for each visual examination exceeds 0.2 man-rem of gamma and neutron exposure. The neutron exposure is of particular concern when these examinations are performed very shortly after unit shutdown or during unit start-up.

Boston Edison Company believes that the insignificant safety benefit obtained by performing visual examinations when outages are less than 92 days apart does not justify the additional radiation exposure and costs incurred as a result of these inspections.

In summary we request favorable review of our relief request and accompanying justification. Should you have any questions, do not hesitate to contact us.

Very truly yours,

WD Harrington

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