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WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

December 23, 1985  
BEC0 85-227  
Proposed Change 85-15

Mr. John A. Zwolinski, Director  
BWR Project Directorate #1  
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 to  
Notes for Tables 3.1.1 and 3.2.A

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 Note 1 to Table 3.1.1, and Note 1 to Table 3.2.A. These note changes add a formal time limit for keeping RPS and PCIS equipment out of service during testing and calibration.

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

ADD: BWR - L/BC's TECH SUPPORT

Very truly yours,

PMK/kmc

Attachment

One original and 39 (

EB (LIAW)  
PSB (L. HULMAN)  
EICSB (SRINIVASAN)  
RSB (ACTING)  
FOB (VASSALLO)  
AD - G. LAINAS (Ltr only)

*WD Harrington*

Commonwealth of Massachusetts)  
County of Suffolk )

Then personally appeared before me, William D. Harrington, who, being duly sworn, did state that he is Senior Vice-President, Nuclear of Boston Edison Company and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of 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*  
DATE

*Peter M Kahler*  
NOTARY PUBLIC

cc: See next page

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BOSTON EDISON COMPANY

Mr. John A. Zwolinski, Director

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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, "Notes for Table 3.1.1" found on page 28, and "Notes for Table 3.2.A" found on page 46.

Currently Note 1 to Table 3.1.1 states, in part:

There shall be two operable or tripped trip systems for each function. If the minimum number of operable instrument channels per trip system cannot be met for both trip systems, the appropriate actions listed below shall be taken.

This is to be changed to state:

There shall be two operable or tripped systems for each function. An instrument channel may be placed in an inoperable status for up to 6 hours for required surveillance without placing the trip system in the tripped condition provided at least one OPERABLE channel in the same trip system is monitoring that parameter. If the minimum number of operable instrument channels per trip system cannot be met for both trip systems, the appropriate actions listed below shall be taken

Currently Note 1 to Table 3.2.A states:

Whenever Primary Containment integrity is required by Section 3.7, there shall be two operable or tripped trip systems for each function.

This is to be changed to state:

Whenever Primary Containment integrity is required by Section 3.7, there shall be two operable or tripped trip systems for each function. An instrument channel may be placed in an inoperable status for up to 6 hours for required surveillance without placing the trip system in the tripped condition provided at least one OPERABLE channel in the same trip system is monitoring that parameter; or, where only one channel exists per trip system, the other trip system shall be operable.

### Reason for Change

This change is proposed because at the present time PNPS Technical Specifications do not provide a formal time limit for keeping RPS and PCIS equipment out of service during testing and calibration. The absence of a formal time has the potential of allowing excessive time to elapse before compensatory measures or restoration are implemented. Further, the absence of a formal time limit can potentially lead to unnecessary disputes on what constitutes a reasonable time for an instrument channel to remain intentionally inoperable during normal maintenance activities.

To preclude the above situations, PNPS proposes to incorporate the 6 hour time limit which is recommended in NEDC-30851P. NEDC-30851P was submitted to NRC on May 31, 1985 by cover letter BWROG-8524 to Mr. Cecil O. Thomas.

### Safety Considerations

The proposed change is not of safety significance because it is a new restriction based on a time limit suggested by NEDC-30851P.

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 basis for proposing that this change to PNPS Technical Specifications does not involve a significant hazards consideration is that the change constitutes an additional restriction where such a restriction does not currently exist.

It is readily apparent that safety is enhanced by the periodic surveillance and maintenance of instrumentation associated with plant safety systems. Likewise, it is apparent that subjecting the plant to periodic shutdowns at a frequency consistent with the instrumentation's current Technical Specification surveillance requirements would be imprudent and less safe because of the potential transients associated with plant changes-of-state. Therefore Technical Specifications allow the deliberate implementation of inoperability under controlled conditions to allow periodic testing and maintenance with minimum impact on plant condition or safety.

This change is consistent with above governing concepts in that it adds to the control of conditions related to the deliberate implementation of inoperability. By adopting this six hour inoperability window where now no window exists, PNPS restricts the occurrence opportunity for events which may pose a threat to safety. Clearly such an additional restriction does not involve a significant increase in the probability or consequences of an accident previously evaluated, but, in fact, should serve to reduce the opportunity for an accident to occur. This additional restriction will not create the possibility of a new or different kind of accident because the act of implementing inoperability, which has been previously reviewed and accepted, is not being expanded but is being given further restriction. This additional restriction will not involve a significant reduction in a margin of safety, but may provide a small increase in the margin of safety because it is a restriction.

For these reasons we propose that the Commission make the determination 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 10CFR170.12(c) this submittal includes a check for \$150.00 in payment of the application fee.