



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

INTERIM SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATIVE TO TECHNICAL SPECIFICATIONS REQUESTED BY GENERIC LETTER 83-36

BOSTON EDISON COMPANY

PILGRIM NUCLEAR POWER STATION

DOCKET NO. 50-293

1.0 INTRODUCTION

NUREG-0737, "Clarification of TMI Action Plan Requirements," identifies certain items for which Technical Specifications are required. The staff provided guidance on the scope of Technical Specifications (TS) for these items in Generic Letter 83-36 (GL 83-36), which was issued to all boiling water reactor licensees on November 1, 1983. In this generic letter, the staff requested the licensees to:

1. review their facilities' Technical Specifications to determine if they were consistent with the guidance provided in the generic letter.
2. submit an application for a license amendment where deviations or absence of Technical Specifications were found.

By letter dated August 9, 1984, as amended by letters dated September 21, and October 19, 1984, the Boston Edison Company (BECo, the licensee) responded to GL 83-36 by submitting Technical Specifications change requests for Pilgrim Station with respect to the following TMI Action Plan items:

1. II.F.1.1 - Noble Gas Effluent Monitors
2. II.F.1.3 - Containment High-Range Radiation Monitor
3. II.F.1.4 - Containment Pressure Monitor
4. II.F.1.5 - Containment Water Level Monitor

The TS changes referred to above were made by Amendment No. 83 to Facility Operating License No. DPR-35, which was issued on November 7, 1984. With respect to the remaining TMI Action Plan items addressed by GL 83-36, BECo provided responses in its letters dated February 3, 1984, April 11, and May 28, 1985. These responses were evaluated as indicated below.

2.0 EVALUATION

2.1 Item II.B.1 - Reactor Coolant System Vents

The licensee states that "this is not applicable because Pilgrim does not have isolation condensers." That position is consistent with the staff's guidance in GL 83-36 and is, therefore, acceptable.

2.2 Item II.B.3 - Post-Accident Sampling

Item II.F.1.2 - Sampling and Analysis of Plant Effluents

The guidance in GL 83-36 suggested a single Administrative Technical Specification to address both II.B.3 and II.F.1.2. It would require that a program be established, implemented and maintained which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program would include training of personnel, procedures for sampling and analysis, and provisions for maintenance of sampling and analysis.

BECO's position is that the objective of the suggested Technical Specification is already adequately assured by License Condition 3.I and TS Section 6.8.A. The license conditions requires the installation of a post-accident sampling system (PASS) and a containment atmospheric monitoring system no later than June 30, 1985. TS 6.8.A requires that written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of NRC Regulatory Guide 1.33.

Comparison of BECO's position with the guidance in GL 83-36 indicates that License Condition 3.I and TS 6.8.A are not stated in a sufficiently comprehensive manner to assure that they are equivalent to the suggested TS with respect to PASS. Furthermore, License Condition 3.I does not address radioactive iodines and particulates in plant gaseous effluents. Therefore, we do not find the licensee's position to be acceptable.

2.3 Item II.F.1.6 - Containment Hydrogen Monitor

Pilgrim TS Sections 3.7.A and 4.7.A already include provisions which meet the intent of GL 83-36 with respect to containment hydrogen monitors. We, therefore, find that no TS changes are necessary concerning II.F.1.6.

2.4 Item III.D.3.4 - Control Room Habitability Requirements

Our Safety Evaluation, dated June 24, 1982, regarding III.D.3.4 measures to protect control room operators, concluded that the control room habitability systems at Pilgrim Station are acceptable and no toxic gas detectors were found necessary. Since no toxic gas detectors have been installed, a Technical Specification concerning the operability of such detectors is not needed.

The Pilgrim Technical Specifications already address the intent of GL 83-36 with respect to the Control Room High Efficiency Air Filtration System.

3.0 CONCLUSION

The Boston Edison Company has adequately responded to the guidance in Generic Letter 83-36, except with respect to Technical Specifications

for Post-Accident Sampling (II.B.3) and Analysis of Plant Effluents (II.F.1.2). We recommend that the model Technical Specifications for these items, which were provided with GL 83-36, be adopted by the licensee.

Principal Contributor: C. Patel and P. Leech

Dated: July 5, 1985