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

BEC0 88-007

January 14, 1987

License DPR-35  
Docket 50-293

PROPOSED TECHNICAL SPECIFICATION CHANGE  
CONCERNING ADMINISTRATIVE SECTION 6.9.C

Dear Sir:

Pursuant to 10CFR50.90, Boston Edison Company (BEC0) requests an administrative change to section 6.9.C of the Pilgrim Nuclear Power Station Technical Specifications. The changes allow submittal of a supplement to the January semi-annual release report, correction of a numbering error, and the elimination of a page. Attachment 1 describes the changes and Attachment 2 contains the specific page being changed.

An application fee of one hundred and fifty dollars (\$150.00) will be electronically transferred to your offices in accordance with 10CFR170.12(c).

*R. G. Bird*  
R. G. Bird

GGW/amm/1607

- Attachments: 1. Proposed Technical Specification Change Administrative  
Section 6.9.C  
2. List of Affected Pages

1 signed original and 37 copies

cc: See next page

Commonwealth of Massachusetts)  
County of Suffolk )

Then personally appeared before me, Ralph G. Bird, 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:

*April 3, 1992*  
DATE

*James D. Keyes*  
NOTARY PUBLIC

BOSTON EDISON COMPANY

January 14, 1988

U.S. Regulatory Commission

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cc: Mr. D. McDonald, Project Manager  
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Senior NRC Resident Inspector  
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Mr. Robert M. Hallisey, Director  
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Massachusetts Department of Public Health  
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Proposed Technical Specification Change

Administrative Section 6.9.C

Description and Reason for Change

Section 6.9.C.1 of Pilgrim Nuclear Power Station (PNPS) Technical Specification requires that a Semi-Annual Radioactive Effluent Release Report be submitted 60 days after January 1 and July 1. Within the content of the January report, an annual dose assessment and meteorological report is also required.

The type of analyses conducted for these portions of the report can only be performed by outside contractors using highly sophisticated and sensitive equipment. Difficulties in obtaining timely test results has led to requests for NRC authorization for supplemental reports in past years.

The requested change would modify the technical specification to allow for the submission of a supplement to the January Semi-Annual Radioactive Effluent Release Report. The supplement would contain the dose and meteorological summary report, and would be required within 90 days of January 1 each year. Except for one instance, when a contractor's computer failed, it is BECo's experience that this 30-day extension will provide the added time necessary for preparing the annual summaries and estimated dose assessments.

A similar request for this change was granted as Amendment 98 to Yankee Rowe's Technical Specifications on August 20, 1986.

The change is as follows:

Change Section 6.9.C.1

From:

1. Radioactive Effluent Release Report

A report shall be submitted to the Commission within 60 days after January 1 and July 1 of each year specifying the quantity of each of the principal radionuclides released at and beyond the site boundary in liquid and gaseous effluents during the previous 6 months. The format and content of the report shall be in accordance with Appendix B of Regulatory Guide 1.21 (Revision 1) dated June, 1974.

To:

1. Semi-Annual Radioactive Effluent Release Report

- a. Routine radioactive effluent release reports covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The report should be in accordance with Appendix B of Regulatory Guide 1.21 (Revision 1) dated June, 1974. A supplemental report containing dose assessments for the previous year shall be submitted annually within 90 days after January 1.

Other changes to this page (223) are also being requested.

One change eliminates a numbering error. The Offsite Dose Calculation Manual (ODCM) is presently listed as section 6.9.C.3, as is "Special Reports" on page 224. The change consists of renumbering the ODCM section to 6.9.C.1.b and retitling section 6.9.C.1 as "Semi-Annual Radioactive Effluent Release Report".

Also, on page 223a, the portion of the last paragraph of section 6.9.C.2 "Annual Radiological Environmental Monitoring Report" is being moved to page 223, allowing the elimination of page 223a.

#### Evaluation and Determination of No Significant Hazards Consideration

10CFR50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis using the standards in 10CFR50.92, concerning the issue of no significant hazards consideration. In accordance with 10CFR50.91, the following analysis has been performed.

The administrative controls section of the current Technical Specification requires the submission of the radioactive effluent release report within 60 days after January 1 and July 1 each year. The January 1 report currently is required to include a summary of the previous year's hourly meteorological data, and an assessment of radiation doses from radioactive liquids and gases. The proposed change would allow an additional 30 days (total of 90 days) after January 1 to provide the hourly meteorological data and dose assessment. This proposed change does not modify the information to be submitted, only the date of submission.

The other changes consist of page renumbering and section restructuring for consistency.

Thus we have concluded that this amendment does not involve a significant hazards consideration, as the changes affect only the administrative section and are :

- a) pro forma in nature, aimed at establishing consistency in section numbering and pagination;
- b) requesting a change to the submittal date of a portion of a report only which does not diminish or eliminate the content of information submitted to the NRC.

This change has been reviewed and approved by the Operations Review Committee. The change will be reviewed by the Nuclear Safety Review and Audit Committee.