

April 7, 2000

Mr. Theodore A. Sullivan  
Vice President Nuclear and Station Director  
Entergy Nuclear Generation Company  
Pilgrim Nuclear Power Station  
600 Rocky Hill Road  
Plymouth, MA 02360

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) RE: BANKED POSITION  
WITHDRAWAL SEQUENCE TECHNICAL SPECIFICATION CHANGE, PILGRIM  
NUCLEAR POWER STATION (TAC NO. MA6107)

Dear Mr. Sullivan:

By letter dated June 16, 1999, you proposed changes to the Technical Specifications related to the banked position withdrawal sequence at the Pilgrim Nuclear Power Station (PNPS). The staff has reviewed this request and determined that additional information is needed to complete the review. Enclosed is the staff's RAI. We request that you respond by April 30, 2000, as discussed with and agreed upon by Stephen Brennon of your staff.

Questions regarding this request should be sent to my attention at the above address or you can contact me at 301-415-1445.

Sincerely,

*/RA/*

Alan B. Wang, Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosure: Request for Additional Information

cc w/encl: See next page

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## REQUEST FOR ADDITIONAL INFORMATION

### PILGRIM NUCLEAR POWER STATION, UNIT 1

By letter dated June 16, 1999, Entergy Nuclear Generation Company (Entergy) proposed changes to the technical specifications (TSs) related to reactivity control. Entergy has stated these changes are necessary to verify compliance with the Pilgrim TSs limits on control rod worth. The following questions are related to the proposed changes to ensure Pilgrim will be in compliance with its current control rod worth TSs.

1. TS 3.3.A.2.b

Entergy has proposed replacing TS 3.3.A.2.b with TS 3.3.B.1 Action C. A note stating "Separate Condition Entry is allowed for each control rod" is added prior to proposed Action C.1. The applicability of this note would be more clear if placed prior to all the Actions.

2. Proposed TS 3.3.B.1 Action D

This proposed Action is added for when control rods are not in compliance with NEDO-21231, "Banked Position Withdrawal Sequence (BPWS)" and separation criteria. Entergy has proposed an 8-hour Completion Time for restoring compliance with BPWS and restoring control rod operability. The STS/NUREG-1433 recommended Completion Time is 4 hours. Justify the deviation from the STS.

3. Proposed TS SR 4.3.B.1.4

The control rod surveillances have been retained to conduct scram time tests after refuelings and outages that last greater than 120 days, and sample tests every 120 days (SR 4.3.C.1 and SR 4.3.C.2). In addition, the STS/NUREG-1433 recommends surveillances for conduct of scram time tests after work on control rods or the CRD system. Why have these STS surveillances not been adopted?

4. Proposed TS 3.3.B.1 Action E

This Condition and the associated Action have been added for when there are one or more groups with four or more inoperable control rods and is similar to the STS. However, the Completion Time for the proposed TS Action is 8 hours while the STS Completion Time is 4 hours. Justify the deviation from the STS.

5. Change to the Bases

Entergy has stated that the Bases are controlled by the TS Bases Control Program described in TS 5.5.6. Explain how Bases changes are made and provide the procedures controlling the Bases changes.

Enclosure

6. Proposed TS 3.3.E

Entergy has proposed the Applicability of the Reactivity Anomaly specification to be changed from “during power operation” to “Run Mode.” The STS Applicability is similar to the Pilgrim TSs; however, it is applicable for both “Run Mode” and “Startup Mode.” Reactivity anomalies can occur during power operation, including Startup Mode. The specification should apply in both Run Mode and Startup Mode. Allowances can be made in the Completion Times for the decreased safety significance of the anomalies in the lower power level operations, in order to allow for troubleshooting and correction of the anomaly condition if necessary. Justify the deviation from the STS.

Pilgrim Nuclear Power Station

cc:

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