



Entergy Nuclear Generation Co.  
Pilgrim Nuclear Power Station  
600 Rocky Hill Road  
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Mike Bellamy  
Site Vice President

10CFR50.90

February 2, 2001  
ENGCLtr. 2.01.015

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

Docket No. 50-293  
License No. DPR-35

**MODIFICATION OF TECHNICAL SPECIFICATION CHANGE SUBMITTAL  
CONCERNING PRESSURE-TEMPERATURE LIMIT CURVES**

By letter dated November 22, 2000, Entergy Nuclear Generation Company (ENGCL)-Pilgrim requested NRC review and approval for a change to the pressure-temperature limit curves of Figures 3.6.1, 3.6.2, and 3.6.3 of Pilgrim's Technical Specifications to cover operation between 20, 32 and 48 Effective Full Power Years. A "No Significant Hazards Considerations" evaluation and "Safety Evaluation" were provided in support of the proposed change.

The November 22, 2000, proposed change was developed in accordance with Appendices G and H of 10 CFR Part 50; the ASTM Standards and the ASME Code, which are referenced in Appendices G and H, 10CFR50.36(c)(2); Regulatory Guide 1.99, Revision 2, *Radiation Embrittlement of Reactor Vessel Materials* and Generic Letter 88-11.

**Description of Change**

This proposed change to Pilgrim's November 22, 2000, amendment request adds a footnote to Figures 3.6.1, 3.6.2, and 3.6.3 of Pilgrim's Technical Specifications that states:

**These curves apply to remainder of Operating Cycle 13 and Operating Cycle 14.**

Amended Technical Specification pages are attached to this letter.

**Reason for Change**

During NRC review of the amendment request, Pilgrim learned that a new methodology for calculating neutron fluence was soon to be approved by the NRC for industry use. The November 22, 2000, amendment request curves used an approved fluence methodology that may be superseded by the new methodology. Pilgrim, therefore, is amending the November 22, 2000, amendment request by limiting application of the proposed curves to essentially one cycle, that is, the remainder of operating cycle 13 and operating cycle 14. Operating cycle 13 is nearly over; operating cycle 14 is scheduled to commence at the conclusion of refueling outage 13, currently scheduled for May, 2001.

ADD1

**No Significant Hazards Considerations and Safety Evaluation**

Pilgrim's November 22, 2000, amendment request provided a "No Significant Hazards Considerations" and "Safety Evaluation" each of which demonstrate that the proposed curves provide confidence that reactor vessel integrity is maintained. This change to those proposed curves is inherently conservative in that it places further limits on operation in the regimes defined by the proposed curves. Therefore, this change is within the purview of the "No Significant Hazards Considerations" and "Safety Evaluation" provided in the submittal, and within the purview of the "No Significant Hazards Considerations" published December 27, 2000, in the Federal Register (65FR249, pages 81915-81916).

**Environmental Considerations**

Pilgrim's November 22, 2000, amendment request provided "Environmental Considerations" which concluded that operating Pilgrim within the regimes described by the proposed curves was not inimical to the environment. The change to the proposed curves imposes a further restriction and is, therefore, inherently conservative; hence, this proposed change is within the purview of the November 22, 2000, "Environmental Considerations," and is not inimical to the environment.

This exemption request is made in accordance with 10CFR50.90. Please contact P.M. Kahler at (508) 830-7939 if you require further information on this issue.

Sincerely,



Mike Bellamy

Commonwealth of Massachusetts)  
County of Plymouth )

Then personally appeared before me, Mike Bellamy, who being duly sworn, did state that he is Site Vice President, Entergy Nuclear Generation Company and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Entergy Nuclear Generation Company and that under the penalty of perjury the foregoing is true and correct.

My commission expires:

September 20, 2002  
DATE



NOTARY PUBLIC



Attachments: Amended Figures 3.6.1, 3.6.2, and 3.6.3 of Pilgrim's Technical Specifications

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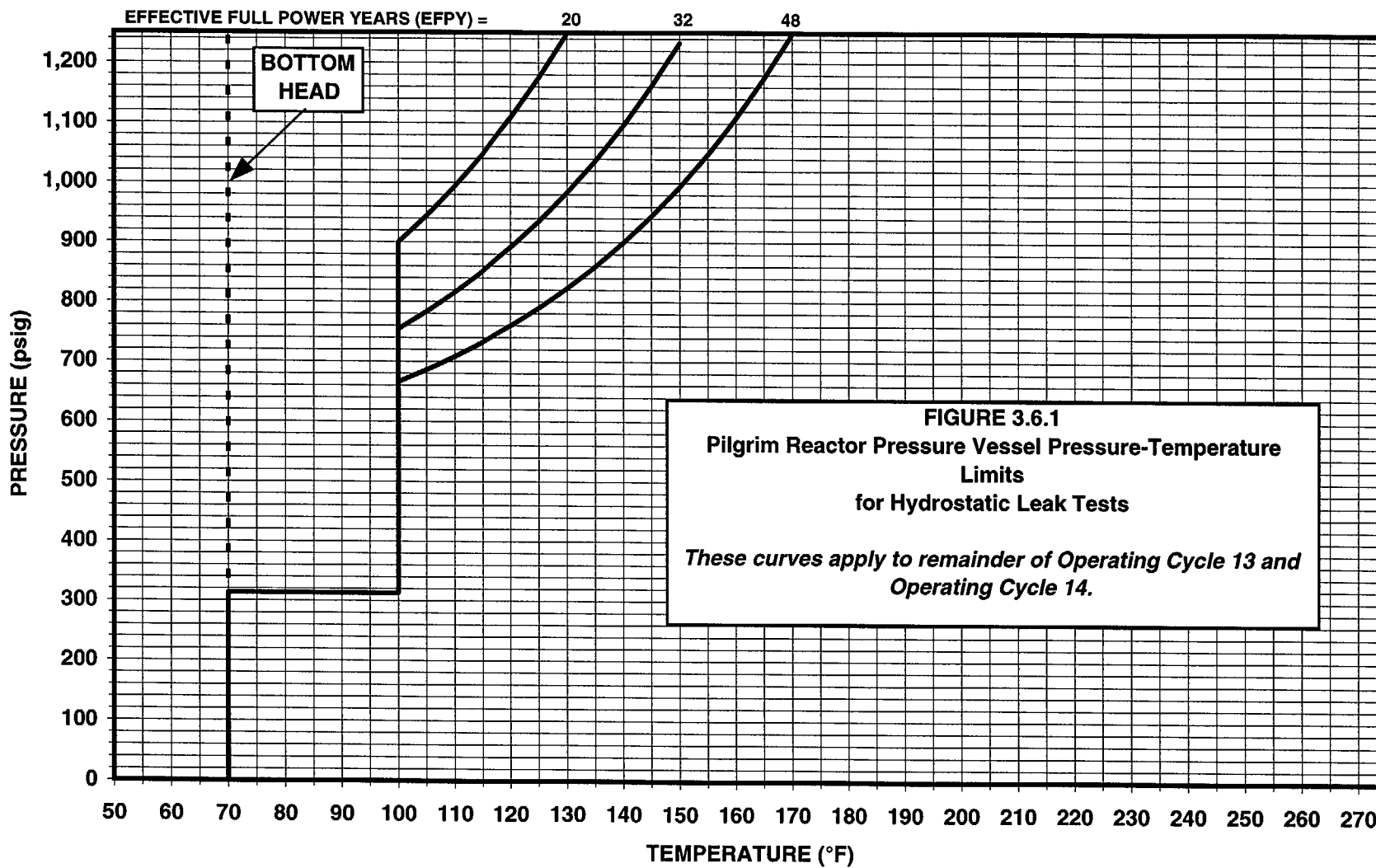
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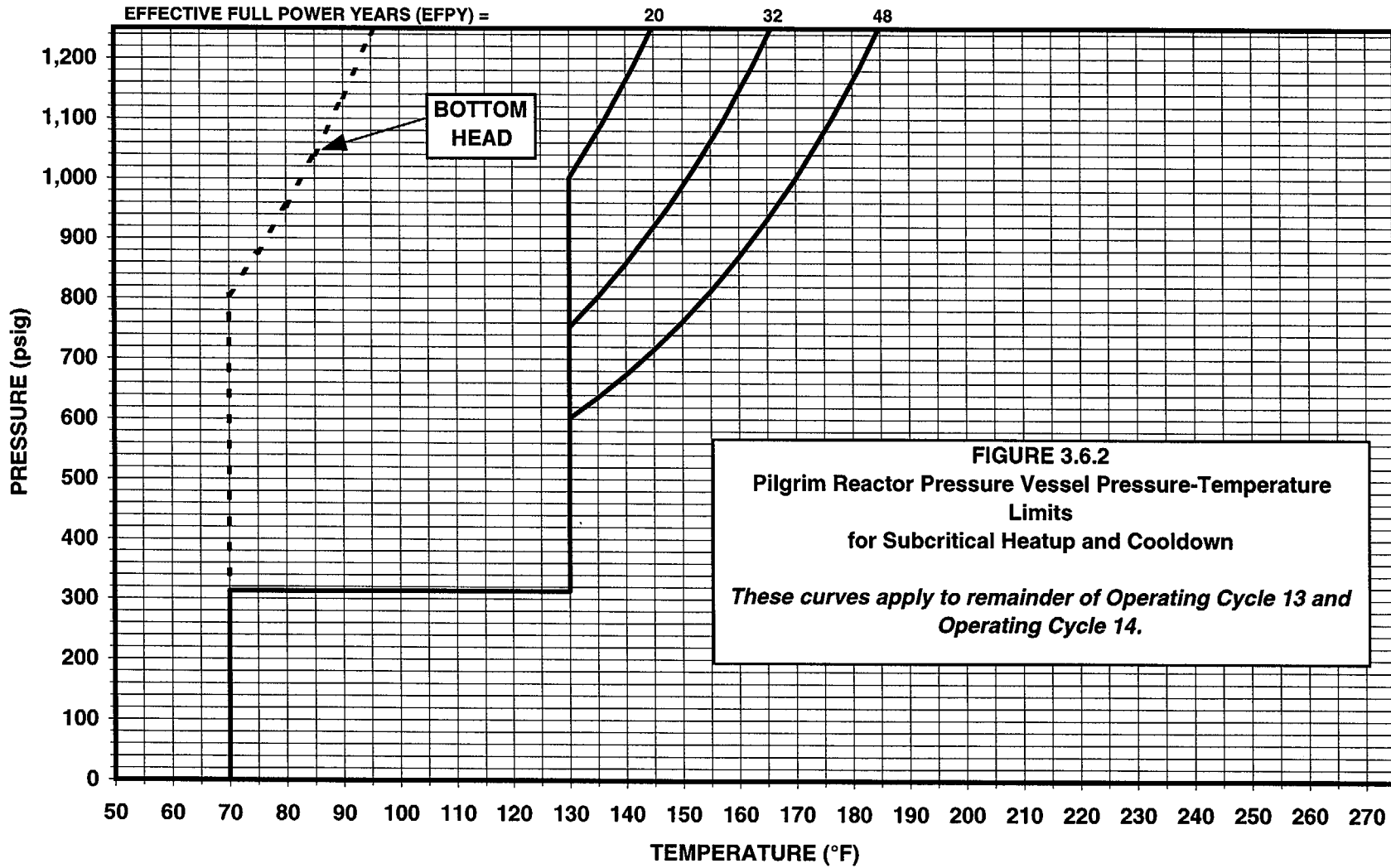
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**Revised Figures 3.6.1, 3.6.2, and 3.6.3 of Pilgrim's Technical Specifications**

**PILGRIM REACTOR VESSEL PRESSURE-TEMPERATURE LIMITS**  
**HYDROSTATIC AND LEAK TESTS**



**PILGRIM REACTOR VESSEL PRESSURE-TEMPERATURE LIMITS**  
**SUBCRITICAL HEATUP AND COOLDOWN**



**PILGRIM REACTOR VESSEL PRESSURE-TEMPERATURE LIMITS**  
**CRITICAL CORE OPERATION**

