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SEP 10 1976

Docket No. 50-293

Boston Edison Company  
M/C NUCLEAR  
ATTN: Mr. J. E. Larson  
Nuclear Licensing  
Administrator - Operations  
800 Boylston Street  
Boston, Massachusetts 02199

Gentlemen:

In response to your request dated March 10, 1976, the Commission has issued the enclosed Amendment No. 20 to Facility Operating License No. DPR-35 for the Pilgrim Nuclear Power Station Unit No. 1.

This amendment modifies the existing Pilgrim Unit No. 1 Snubber Technical Specifications to (1) specify the safety related snubbers which must be inspected, (2) provide for adding snubbers to safety related systems, (3) delete the requirement that the initial snubber inspection be performed within 6 months of the issuance of Amendment No. 9 which was issued on May 15, 1975, and (4) delete the requirement to disassemble two snubbers during each refueling outage.

Copies of our related Safety Evaluation and the Notice of Issuance also are enclosed.

Sincerely,

Original signed by  
M. Grotenhuis

*goc*

Dennis L. Ziemann, Chief  
Operating Reactors Branch #2  
Division of Operating Reactors

Enclosures:

- 1. Amendment No. 20 to DPR-35
- 2. Safety Evaluation
- 3. Notice of Issuance

OFFICE ➤	OR:ORB #2	OR:ORB #2 PWO'	OR:ORB #2	OELD	OR:ORB #2
SURNAME ➤	RMDiggs	PWO' Connor:ro	RPSnaider	Drossman	DNZiemann
DATE ➤	7/24/76	7/24/76	7/22/76	9/19/76	9/10/76

Boston Edison Company

- 2 -

September 10, 1976

cc w/enclosures:

Mr. J. A. Smith  
Pilgrim Station Manager  
Boston Edison Company  
RFD #1, Rocky Hill Road  
Plymouth, Massachusetts 02360

Anthony Z. Roisman, Esquire  
Roisman, Kessler and Cashdan  
1712 N Street, N. W.  
Washington, D. C. 20036

Henry Herrmann, Esquire  
Massachusetts Wildlife Federation  
151 Tremont Street  
Boston, Massachusetts 02111

Plymouth Public Library  
North Street  
Plymouth, Massachusetts 02360

Mr. David F. Tarantino  
Chairman, Board of Selectmen  
11 Lincoln Street  
Plymouth, Massachusetts 02360

cc w/enclosures and cy of BECo  
filing dtd. 3/10/76:  
Henry Kolbe, M. D.  
Acting Commissioner of Public Health  
Massachusetts Department of  
Public Health  
600 Washington Street  
Boston, Massachusetts 02202



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

BOSTON EDISON COMPANY

DOCKET NO. 50-293

PILGRIM NUCLEAR POWER STATION UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 20  
License No. DPR-35

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Boston Edison Company (the licensee) dated March 10, 1976, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*for M. Grotzke*  
Dennis L. Ziemann, Chief  
Operating Reactors Branch #2  
Division of Operating Reactors

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: September 10, 1976

ATTACHMENT TO LICENSE AMENDMENT NO. 20

FACILITY OPERATING LICENSE NO. DPR-35

DOCKET NO. 50-293

The following changes relate to the Appendix A portion of the Pilgrim Technical Specifications. The changed areas on the revised pages are shown by marginal lines.

Remove pages

137a  
137b  
137c

151a  
151b

Insert Pages

137a  
137b  
137c  
137d  
137e  
151a  
151b

3.6.I Shock Suppressors (Snubbers)

1. During all modes of operation except Cold Shutdown and Refuel, all safety-related snubbers listed in Table 3.6.1 shall be operable except as noted in 3.6.I.2 through 3.6.I.4 below.
2. From and after the time that a snubber is determined to be inoperable, continued reactor operation is permissible only during the succeeding 72 hours unless the snubber is sooner made operable or replaced.
3. If the requirements of 3.6.I.1 and 3.6.I.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a cold shutdown condition within 36 hours.
4. If a snubber is determined to be inoperable while the reactor is in the shutdown or refuel mode, the snubber shall be made operable or replaced prior to reactor startup.
5. Snubbers may be added to safety related systems without prior License Amendment to Table 3.6.1 provided that a revision to Table 3.6.1 is included with the next license amendment request.

4.6.I Shock Suppressors (Snubbers)

The following surveillance requirements apply to all hydraulic snubbers listed in Table 3.6.1.

1. All hydraulic snubbers whose seal material has been demonstrated by operating experience, lab testing or analysis to be compatible with the operating environment shall be visually inspected. This inspection shall include, but not necessarily be limited to, inspection of the hydraulic fluid reservoir, fluid connections, and linkage connection to the piping and anchor to verify snubber operability in accordance with the following schedule:

Number of Snubbers Found Inoperable During Inspection or During Inspection Interval	Next Required Inspection Interval
0	18 months + 25%
1	12 months + 25%
2	6 months + 25%
3,4	124 days + 25%
5,6,7	62 days + 25%
>8	31 days + 25%

The required inspection interval shall not be lengthened more than one step at a time.

Snubbers may be categorized in two groups, "accessible" or "inaccessible" based on their accessibility for inspection during reactor operation. These two groups may be inspected independently according to the above schedule.

2. All hydraulic snubbers whose seal materials are other than ethylene propylene or other material that has been demonstrated to be compatible with the operating environment shall be visually inspected for operability every 31 days.

**4.6.I Shock Suppressors (Snubbers)**

3. Once each refueling cycle, a representative sample of 10 hydraulic snubbers or approximately 10% of the hydraulic snubbers, whichever is less, shall be functionally tested for operability including verification of proper piston movement, lock up and bleed. For each unit and subsequent unit found inoperable, an additional 10% or ten hydraulic snubbers shall be so tested until no more failures are found or all units have been tested.

Table 3.6.1

## SAFETY RELATED SHOCK SUPPRESSORS (SNUBBERS)

Snubber No.	Location	Elevation	Snubber in High Radiation Area During Shutdown	Snubbers Especially Difficult to Remove	Snubbers Inaccessible During Normal Operation	Snubbers Accessible During Normal Operation
SS-1-10-1	Main Steam Line	42'			X (Drywell)	
SS-1-10-2	Main Steam Line	42'			X (Drywell)	
SS-1-10-3	Main Steam Line	42'			X (Drywell)	
SS-1-10-4	Main Steam Line	42'			X (Drywell)	
SS-1-10-5	Main Steam Line	42'			X (Drywell)	
SS-1-10-6	Main Steam Line	42'			X (Drywell)	
SS-1-10-7	Main Steam Line	42'			X (Drywell)	
SS-1-10-8	Main Steam Line	42'			X (Drywell)	
SS-1-10-9	Main Steam Line	42'			X (Drywell)	
SS-1-10-10	Main Steam Line	42'			X (Drywell)	
SS-1-10-11	Main Steam Line	42'			X (Drywell)	
SS-1-10-12	Main Steam Line	42'			X (Drywell)	
SS-6-10-6	Feedwater Sys.	41'			X (Drywell)	
SS-6-10-7	Feedwater Sys.	41'			X (Drywell)	
SS-6-10-8	Feedwater Sys.	44'			X (Drywell)	
SS-6-10-9	Feedwater Sys.	41'			X (Drywell)	
SS-6-10-1-	Feedwater Sys.	44'			X (Drywell)	
SS-10-30-1	RHR System	52'			X (Drywell)	
SS-10-20-2	RHR System	52'			X (Drywell)	
SS-10-20-3	RHR System	52'			X (Drywell)	
SS-10-20-4	RHR System	52'			X (Drywell)	
SS-10-30-5	RHR System	24'			X (Drywell)	
SS-10-30-6	RHR System	24'			X (Drywell)	
SS-10-20-7	RHR System	24'			X (Drywell)	
SS-10-20-8	RHR System	24'			X (Drywell)	
SS-10-3-9	RHR System	87'			X (Drywell)	
SS-10-3-10	RHR System	90'			X (Drywell)	
SS-2-20-1	Recirc. System	36'	X		X (Drywell)	
SS-2-20-2	Recirc. System	36'	X		X (Drywell)	
SS-2-20-3	Recirc. System	36'	X		X (Drywell)	
SS-2-20-4	Recirc. System	36'	X		X (Drywell)	
SS-2-20-5	Recirc. System	15'	X		X (Drywell)	
SS-2-30-6	Recirc. System	15'	X		X (Drywell)	
SS-2-30-7	Recirc. System	15'	X		X (Drywell)	

Table 3.6.1

## SAFETY RELATED SHOCK SUPPRESSORS (SNUBBERS)

Snubber No.	Location	Elevation	Snubber in High Radiation Area During Shutdown	Snubbers Especially Difficult to Remove	Snubbers Inaccessible During Normal Operation	Snubbers Accessible During Normal Operation
SS-2-30-8	Recirc. System	15'	X		X (Drywell)	
SS-2-30-9	Recirc. System	11'	X		X (Drywell)	
SS-2-30-10	Recirc. System	11'	X		X (Drywell)	
SS-2-30-11	Recirc. System	27'	X		X (Drywell)	
SS-2-30-12	Recirc. System	27'	X		X (Drywell)	
SS-2-30-13	Recirc. System	27'	X		X (Drywell)	
SS-2-30-14	Recirc. System	27'	X		X (Drywell)	
SS-2-30-15	Recirc. System	27'	X		X (Drywell)	
SS-2-30-16	Recirc. System	27'	X		X (Drywell)	
SS-2-10-17	Recirc. System	17'	X		X (Drywell)	
SS-2-10-18	Recirc. System	17'	X		X (Drywell)	
SS-2-20-19	Recirc. System	16'	X		X (Drywell)	
SS-2-20-20	Recirc. System	16'	X		X (Drywell)	
SS-2-20-21	Recirc. System	19'	X		X (Drywell)	
SS-2-20-22	Recirc. System	16'	X		X (Drywell)	
SS-2-50-23	Recirc. System	17'	X		X (Drywell)	
SS-2-20-24	Recirc. System	18'	X		X (Drywell)	
SS-2-20-25	Recirc. System	16'	X		X (Drywell)	
SS-2-50-26	Recirc. System	16'	X		X (Drywell)	
SS-3-3-1	Control Rod Drive	42'	X		X (Drywell)	

Table 3.6.1

## SAFETY RELATED SHOCK SUPPRESSORS (SNUBBERS)

Snubber No.	Location	Elevation	Snubber in High Radiation Area During Shutdown	Snubbers Especially Difficult to Remove	Snubbers Inaccessible During Normal Operation	Snubbers Accessible During Normal Operation
SS-6-10-1	Feedwater System	.42'			X (Drywell)	
SS-6-10-2	Feedwater System	42'			X (Drywell)	
SS-6-10-3	Feedwater System	42'			X (Drywell)	
SS-6-10-4	Feedwater System	42'			X (Drywell)	
SS-6-10-5	Feedwater System	42'			X (Drywell)	
SS-13-3-1	RCIC	38'			X (Drywell)	
SS-13-3-2	RCIC	38'			X (Drywell)	
SS-14-3-1	Core Spray	65'			X (Drywell)	
SS-14-3-2	Core Spray	65'			X (Drywell)	
SS-14-3-3	Core Spray	65'			X (Drywell)	
SS-14-3-4	Core Spray	65'			X (Drywell)	
SS-23-10-1	H.P.C.I.	42'			X (Drywell)	
SS-23-10-2	H.P.C.I.	42'			X (Drywell)	
SS-23-3-30	H.P.C.I.	-3'09"				X H.P.C.I. Quadrant
SS-23-3-31	H.P.C.I.	-3'09"				X H.P.C.I. Quadrant
SS-23-10-32	H.P.C.I.	-3'09"				X H.P.C.I. Quadrant
SS-23-3-33	H.P.C.I.	-3'09"				X H.P.C.I. Quadrant
SS-23-10-34	H.P.C.I.	-6'				X H.P.C.I. Quadrant
SS-23-10-35	H.P.C.I.	-6'				X H.P.C.I. Quadrant
SS-23-3-36	H.P.C.I.	-3'09"				X H.P.C.I. Quadrant
SS-23-3-37	H.P.C.I.	-3'09"				X H.P.C.I. Quadrant
SS-10-3-43	RHR	-3'06"				X RHR Pump Room
SS-10-20-44	RHR	-3'06"				X RHR Pump Room
SS-30-3-45	RBCCW	83'5"				X Reactor Building
SS-10-10-46	RHR	6"				X Torus Compartment

Amendment No. 20

137e

Modifications to this Table due to changes in high radiation areas should be submitted to the NRC as part of the next license amendment.

## BASES:

### 3.6.I and 4.6.I

#### Shock Suppressors (Snubbers)

Snubbers are designed to prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, while allowing normal thermal motion during startup and shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping as a result of a seismic or other event initiating dynamic loads. It is therefore required that all snubbers required to protect the primary coolant system or any other safety system or component be operable during reactor operation.

Because the snubber protection is required only during low probability events, a period of 72 hours is allowed for repairs or replacements. In case a shutdown is required, the allowance of 36 hours to reach a cold shutdown condition will permit an orderly shutdown consistent with standard operating procedures. Since plant startup should not commence with knowingly defective safety related equipment, Specification 3.6.I.4 prohibits startup with inoperable snubbers.

All safety related hydraulic snubbers are visually inspected for overall integrity and operability. The inspection will include verification of proper orientation, adequate hydraulic fluid level and proper attachment of snubber to piping and structures.

The inspection frequency is based upon maintaining a constant level of snubber protection. Thus the required inspection interval varies inversely with the observed snubber failures. The number of inoperable snubbers found during a required inspection determines the time interval for the next required inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

Experience at operating facilities has shown that the required surveillance program should assure an acceptable level of snubber performance provided that the seal materials are compatible with the operating environment.

Snubbers containing seal material which has not been demonstrated by operating experience, lab tests or analysis to be compatible with the operating environment should be inspected more frequently (every month) until material compatibility is confirmed or an appropriate changeout is completed.

Examination of defective snubbers at reactor facilities and material tests performed at several laboratories (Reference 1) has shown that millable gum polyurethane deteriorates rapidly under the temperature and moisture conditions present in many snubber locations. Although molded polyurethane exhibits greater resistance to these conditions, it also may be unsuitable for application in the higher temperature environments. Data are not currently available to precisely define an upper temperature limit for the molded polyurethane. Lab tests and in-plant experience indicate that seal materials are available, primarily ethylene propylene

BASES:

3.6.I and 4.6.I

Shock Suppressors (Snubbers) (cont'd)

compounds, which should give satisfactory performance under the most severe conditions expected in reactor installations.

To further increase the assurance of snubber reliability, functional tests should be performed once each refueling cycle. These tests will include stroking of the snubbers to verify proper piston movement, lock-up and bleed. Ten percent or ten snubbers, whichever is less, represents an adequate sample for such tests. Observed failures on these samples should require testing of additional units. Those snubbers designated in Table 3.6.1 as being in high radiation areas or especially difficult to remove need not be selected for functional tests provided operability was previously verified.

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(1) Report H. R. Erickson, Bergen Paterson to K. R. Goller, NRC, October 7, 1974  
Subject: Hydraulic Shock Sway Arrestors



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 20 TO LICENSE NO. DPR-35

BOSTON EDISON COMPANY

PILGRIM NUCLEAR POWER STATION UNIT NO. 1

DOCKET NO. 50-293

INTRODUCTION

During the summer of 1973, inspections at two reactor facilities revealed a high incidence of inoperable hydraulic shock suppressors (snubbers) manufactured by Bergen Paterson Pipesupport Corporation. As a result of those findings, the Office of Inspection and Enforcement required each operating reactor licensee to immediately inspect all Bergen Paterson snubbers utilized on safety systems and to reinspect them 45 to 90 days after the initial inspection. Snubbers supplied by other manufacturers were to be inspected on a lower priority basis.

Since a long term solution to eliminate recurring failures was not immediately available, the Division of Reactor Licensing sent a letter dated October 3, 1973, to operating facilities (including Pilgrim) utilizing Bergen Paterson snubbers specifying continuing surveillance requirements and requesting a submittal within one year of proposed Technical Specifications for a snubber surveillance program. On October 7, 1974, Boston Edison proposed Technical Specifications for hydraulic snubbers at Pilgrim Unit No. 1 reactor. On May 15, 1975, those proposed specifications, as modified, were issued as Amendment No. 9 to License No. DPR-35. Subsequently, we found that certain modifications to these specifications were necessary. These modifications were discussed with Boston Edison's staff and by letter dated March 10, 1976, Boston Edison proposed modifications to the Pilgrim Unit No. 1 Technical Specifications.

DISCUSSION

The proposed modifications would:

1. Modify Table 3.6.1 of the Technical Specifications to list the safety related snubbers to be inspected rather than listing the non-safety related snubbers exempt from inspection.

2. Permit safety related snubbers to be added to the system provided that Table 3.6.1 is subsequently revised to reflect the additional snubbers.
3. Delete the requirement that the initial snubber inspection be performed within 6 months of the issuance of Amendment No. 9 which was issued on May 15, 1975.
4. Delete the requirement to disassemble two snubbers from a relatively severe environment during each refueling outage.

#### EVALUATION

We have completed our review of the proposed changes to the Pilgrim Unit No. 1 Technical Specifications. The results of our review of each change follows:

The current Pilgrim Unit No. 1 Technical Specifications require that all snubbers, except snubbers not required to protect the primary coolant system or any other safety related system or component, be inspected. The proposed change explicitly lists those snubbers that are required to protect the primary system and other safety related systems. This change improves the clarity and specificity of the specifications and is acceptable.

During the operational life of the facility, it may be desirable to install additional shock suppressors on safety related systems to provide added protection to these systems. The second proposed change would permit installation of new shock suppressors prior to amending Table 3.6.1, which lists the safety related shock suppressors in the plant. The staff has concluded that the licensee should be permitted to install additional shock suppressors on safety related equipment if deemed necessary without prior approval. We further conclude that the addition of any newly installed shock suppressors to Table 3.6.1 at the time of the next license amendment will assure that the shock suppressor will be included in the surveillance program in an acceptably short period of time.

Specification 4.6.I.3 of the Pilgrim Unit No. 1 Technical Specifications, issued on May 15, 1975, requires that an initial inspection be performed within 6 months of the date of issuance of that specification. This one time requirement has been satisfied and is no longer appropriate to retain in the specifications. The staff concludes that this specification should be deleted.

The fourth proposed change deletes the requirement to disassemble two hydraulic shock suppressors from a relatively severe environment during each refueling outage. Based upon the operating experience gained since our initial requirement that two hydraulic shock suppressors be disassembled and inspected at each refueling outage, we have concluded that there is reasonable assurance that degradation of snubber performance will be accompanied by visually discernible evidence of an unacceptable level of performance such as hydraulic fluid leakage at the fluid connections or by an abnormally large decrease in the quantity of hydraulic fluid retained in the hydraulic fluid reservoirs between visual inspections. We have also concluded that the previously required internal inspection of hydraulic shock suppressors, while not providing a greater level of assurance of operability than the required visual inspections, was contributing to the subsequent failure of the inspected snubber because of the added handling and wear on the seals and close internal tolerance of the hydraulic shock suppressors. For these reasons, we conclude that deletion of the requirement for internal hydraulic shock suppressor inspection is acceptable.

#### ENVIRONMENTAL CONSIDERATION

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and pursuant to 10 CFR §51.5(d)(4) that an environmental statement, negative declaration, or environmental appraisal need not be prepared in connection with the issuance of this amendment.

#### CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) because the changes do not involve a significant increase in the probability or consequences of accidents previously considered and do not involve a significant decrease in a safety margin, the changes do not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: September 10, 1976

UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKET NO. 50-293

BOSTON EDISON COMPANY

NOTICE OF ISSUANCE OF AMENDMENT TO FACILITY  
OPERATING LICENSE

The U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 20 to Facility Operating License No. DPR-35, issued to the Boston Edison Company (the licensee), which revised Technical Specifications for operation of Unit No. 1 of the Pilgrim Nuclear Power Station (the facility) located near Plymouth, Massachusetts. The amendment is effective as of its date of issuance.

This amendment modifies the existing Pilgrim Unit No. 1 Snubber Technical Specifications to (1) specify the safety related snubbers which must be inspected, (2) provide for adding snubbers to safety related systems, (3) delete the requirement that the initial inspection be performed within 6 months of issuance of Amendment No. 9 which was issued on May 15, 1975, and (4) delete the requirement to disassemble two snubbers during each refueling outage.

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment. Prior public notice of this amendment was not required since the amendment does not involve a significant hazards consideration.

The Commission had determined that the issuance of the amendment will not result in any significant environmental impact and that pursuant to 10 CFR §51.5(d)(4) an environmental statement, negative declaration or environmental impact appraisal need not be prepared in connection with issuance of the amendment.

For further details with respect to this action, see (1) the application for this amendment dated March 10, 1976, (2) Amendment No. 20 to License No. DPR-35, and (3) the Commission's concurrently issued related Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N. W., Washington, D. C. and at the Plymouth Public Library on North Street in Plymouth, Massachusetts 02360. A single copy of items (2) and (3) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Operating Reactors.

Dated at Bethesda, Maryland, this tenth day of September, 1976.

FOR THE NUCLEAR REGULATORY COMMISSION



Marshall Grotenhuis, Acting Chief  
Operating Reactors Branch #2  
Division of Operating Reactors

Note to Paul O'Connor  
Project Manager

RE: AMENDMENTS TO OPERATING LICENSE, TECHNICAL SPECIFICATIONS,  
PILGRIM NUCLEAR POWER PLANT UNIT NO. 1 WITH REGARD TO AMENDMENTS  
RELATING TO INSPECTION OF SNUBBERS

I do not concur in the changes to the technical specifications for  
Pilgrim Unit No. 1 relating to the inspection of the snubbers for the  
following reasons:

- We have to take license word for word*
1. There is no statement in the SER that the Staff knows if all the safety related snubbers are listed in the technical specifications.
  2. There is no basis stated in the SER for removing the requirement that snubbers be disassembled during the fuel outage to determine whether there has been degradation of the snubber. Pursuant to our conversation you stated that certain tests have verified that the seals are effective; therefore disassembly is no longer necessary. If this is true, then those tests should be referenced in the SER and an explanation given as to why these tests allow the deletion of the requirement for disassembly of the snubbers.
  3. There are changes in the basis to the technical specifications found on page 151a and 151b. There is no discussion in the SER that these changes are made and there is no discussion as to the reasons why these changes were made. Specifically, on page 151a the phrase "low probability" replaces the "relatively low probability" and on page 151b the phrase "of the impracticability of testing such large units" replaces another phrase. The SER should reflect all changes made whether they be in the technical specifications or the Bases for the technical specification and a reason given for these changes.
- OK*
- SER generally does not deal changes, add bases, no new legal restrictions*

*Barry H. Smith*

Barry H. Smith  
Attorney, OELD