

August 14, 1985

Docket No. 50-293

Mr. William D. Harrington  
Senior Vice President, Nuclear  
Boston Edison Company  
800 Boylston Street  
Boston, Massachusetts 02199

Dear Mr. Harrington:

The Commission has issued the enclosed Amendment No. 88 to Facility Operating License No. DPR-35 for the Pilgrim Nuclear Power Station. This amendment consists of changes to the Technical Specifications (TSs) in response to your applications dated October 16, 1984 and November 9, 1984, as modified by your letter dated February 8, 1985.

The amendment revises the Technical Specifications to reflect changes in the reporting requirements outlined in 10 CFR 50.72 and 50.73 and the guidance provided in our Generic Letter 83-43. It also modifies the administrative section of the Technical Specifications to recognize changes in title, plant organization, and the Operating Review Committee membership and responsibilities.

Your February 8, 1985 letter proposed deletion of Technical Specification 6.5.A.6.j, relative to review of the Station Fire Protection Plan. This change is not included in the enclosed amendment since it was not covered by the initial notice of this action in the Federal Register (50 FR 3048, January 23, 1985). As discussed with Mr. Gerald Whitney of your staff, we suggest that this proposal be resubmitted with a specific justification for making the change.

A copy of the related Safety Evaluation is also enclosed.

Sincerely,

Original signed by/

Paul H. Leech, Project Manager  
Operating Reactors Branch #2  
Division of Licensing

Enclosures:

- Amendment No. 88 to License No. DPR-35
  - Safety Evaluation
- cc w/enclosures:  
See next page

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Docket File  
NRC PDR  
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ORB#2 Reading  
HThompson

FAllenspach  
SNorris  
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ELJordan

BGrimes  
TBarnhart (4)  
WJones  
EButcher  
ACRS (10)

OPA, CMiles  
RDiggs  
Gray File  
Extra - 5  
JPartlow

DL:ORB#2  
SNorris:rc  
08/13/85

DL:ORB#2  
PLeech  
08/01/85

DL:ORB#2  
DVassallo  
08/12/85

OELD  
E.Chan  
08/8/85

DL:AD-OR  
GLatnas  
08/13/85

Mr. William D. Harrington  
Boston Edison Company  
Pilgrim Nuclear Power Station

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

BOSTON EDISON COMPANY

DOCKET NO. 50-293

PILGRIM NUCLEAR POWER STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 88  
License No. DPR-35

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The applications for amendment by Boston Edison Company (the licensee) dated October 16, 1984 and November 9, 1984, as modified on February 8, 1984 comply 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, and paragraph 3.B of Facility Operating License No. DPR-35 is hereby amended to read as follows:

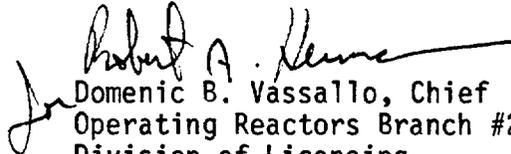
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B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 88, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION

  
Domenic B. Vassallo, Chief  
Operating Reactors Branch #2  
Division of Licensing

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: August 14, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 88

FACILITY OPERATING LICENSE NO. DPR-35

DOCKET NO. 50-293

Revise the Technical Specifications by deleting the following pages and inserting the enclosed pages.

<u>Remove</u>	<u>Insert</u>
iii	iii
126	126
196	196
197	197
208	208
208a	208a
209	209
210	210
212	212
213	213
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5.1 Site Features	206m
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LIMITING CONDITION FOR OPERATION

3.6.C Coolant Chemistry (Cont'd)  
power operation is permissible only during the succeeding seven days.

- 3 If the conditions in 1 or 2 above cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a Cold Shutdown Condition within 24 hours

D. Safety and Relief Vavles

1. During reactor power operating conditions and prior to reactor startup from a Cold Condition, or whenever reactor coolant pressure is greater than 104 psig and temperature greater than 340°F, both safety valves and the safety modes of all relief valves shall be operable.

2. If Specification 3.D.1 is not met, an orderly shutdown shall be initiated and the reactor coolant pressure shall be below 104 psig within 24 hours.  
Note: Technical Specifications 3.6.D.2 - 3.6.D.5 apply only when two Stage Target Rock SRVs are installed.

3. If the temperature of any safety relief discharge pipe exceeds 212°F during normal reactor power operation for a period of greater than 24 hours, an engineering evaluation shall be performed justifying continued operation for the corresponding temp. increases.

4. Any safety relief valve whose discharge pipe temperature exceeds 212°F for 24 hours or more shall be removed at the next cold shutdown of 72 hours or more, tested in the as-found condition, and recalibrated as necessary prior to reinstallation. Power operation shall not continue beyond 90 days

SURVEILLANCE REQUIREMENTS

4.6

D. Safety and Relief Valves

1. At least one safety valve and two relief/safety valves shall be checked or replaced with bench checked valves once per operating cycle. All valves will be tested every two cycles.

The set point of the safety valves shall be as specified in Specification 2.2.

2. At least one of the relief/safety valves shall be disassembled and inspected each refueling outage.

3. Whenever the safety relief valves are required to be operable, the discharge pipe temperature of each safety relief valve shall be logged daily.

4. Instrumentation shall be calibrated and checked as indicated in Table 4.2.F.

5. Notwithstanding the above, as a minimum, safety relief valves that have been in service shall be tested in the as-found condition during both Cycle 6 and Cycle 7.

3.9.B Operation with Inoperable Equipment (Cont'd)

reactor operation is permissible under this condition for seven days. During this period, both diesel generators and associated emergency buses must be demonstrated to be operable.

2. From and after the date that incoming power is not available from both startup and shutdown transformers, continued operation is permissible, provided both diesel generators and associated emergency buses are demonstrated to be operable, all core and containment cooling systems are operable, reactor power level is reduced to 25% of design and the NRC is notified within one (1) hour as required by 10CFR50.72.
3. From and after the date that one of the diesel generators or associated emergency bus is made or found to be inoperable for any reason, continued reactor operation is permissible in accordance with Specification 3.5.F if Specification 3.9.A.1 and 3.9.A.2.a are satisfied.
4. From and after the date that one of the diesel generators or associated emergency buses and either the shutdown or startup transformer power source are made or found to be inoperable for any reason, continued reactor operation is permissible in accordance with Specification 3.5.F, provided either of the

3.9.B Operation with Inoperable Equipment

following conditions are satisfied:

- a. The startup transformer and both offsite 345 kV transmission lines are available and capable of automatically supplying auxiliary power to the emergency 4160 volt buses.
- b. A transmission line and associated shutdown transformer are available and capable of automatically supplying auxiliary power to the emergency 4160 volt buses.
5. From and after the date that one of the 125 or 250 volt battery systems is made or found to be inoperable for any reason, continued reactor operation is permissible during the succeeding three days within electrical safety considerations, provided repair work is initiated in the most expeditious manner to return the failed component to an operable state, and Specification 3.5.F is satisfied.
6. With the emergency bus voltage less than 3950 but above 3745 (excluding transients) during normal operation, transfer the safety related buses to the diesel generators. If grid voltage continues to degrade be in at least Hot Shutdown within the next 4 hours and in Cold Shutdown within the following 12 hours unless the grid conditions improve.

## 6.0 ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

The Nuclear Operations Manager shall be accountable for overall facility operation. In his absence the Nuclear Operations Manager shall designate in writing the individual to assume this responsibility.

### 6.2 ORGANIZATION

#### A. OFFSITE

The Company organization for station management and technical support shall be as shown on Figure 6.2.1.

#### B. FACILITY

The Facility organization shall be as shown on Figure 6.2.2 and:

1. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.1.
2. When the unit is in an operational mode other than cold shutdown or refueling, a person holding a Senior Reactor Operator License shall be present in the control room at all times. In addition to this Senior Operator, a Licensed Operator or Senior Operator shall be present at the controls when fuel is in the vessel.
3. At least two Licensed Operators shall be present in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips.
4. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
5. ALL CORE ALTERATIONS performed while fuel is in the reactor vessel after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
6. A Fire Brigade of 5 members including a Fire Brigade Leader shall be maintained on site at all times. This excludes 3 members of the minimum shift crew necessary for safe shutdown and any personnel required for other essential functions during a fire emergency.

#### C. CHANGES TO THE ORGANIZATION

Changes may be made to the organization without prior license amendment provided that a revision to Section 6.2 is included in a subsequent license amendment request.

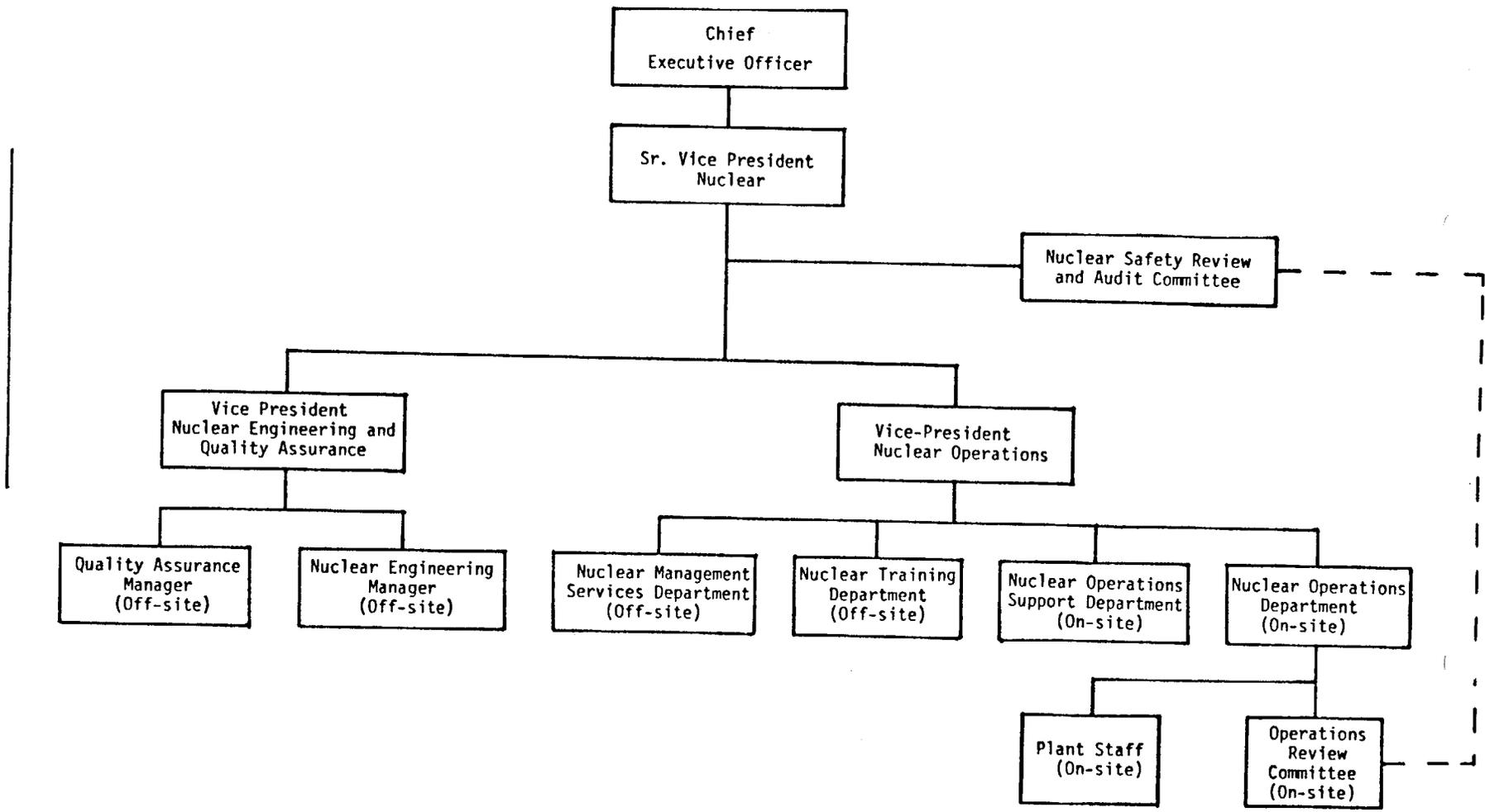
## 6.0 ADMINISTRATIVE CONTROLS

### 6.3 FACILITY STAFF QUALIFICATIONS

The qualifications with regard to educational and experience backgrounds of the facility staff at the time of appointment to the active position shall meet the requirements as described in the American National Standards Institute N18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants." In addition, the individual performing the function of Radiation Protection Manager shall meet or exceed the qualifications of Regulatory Guide 1.8, September, 1975.

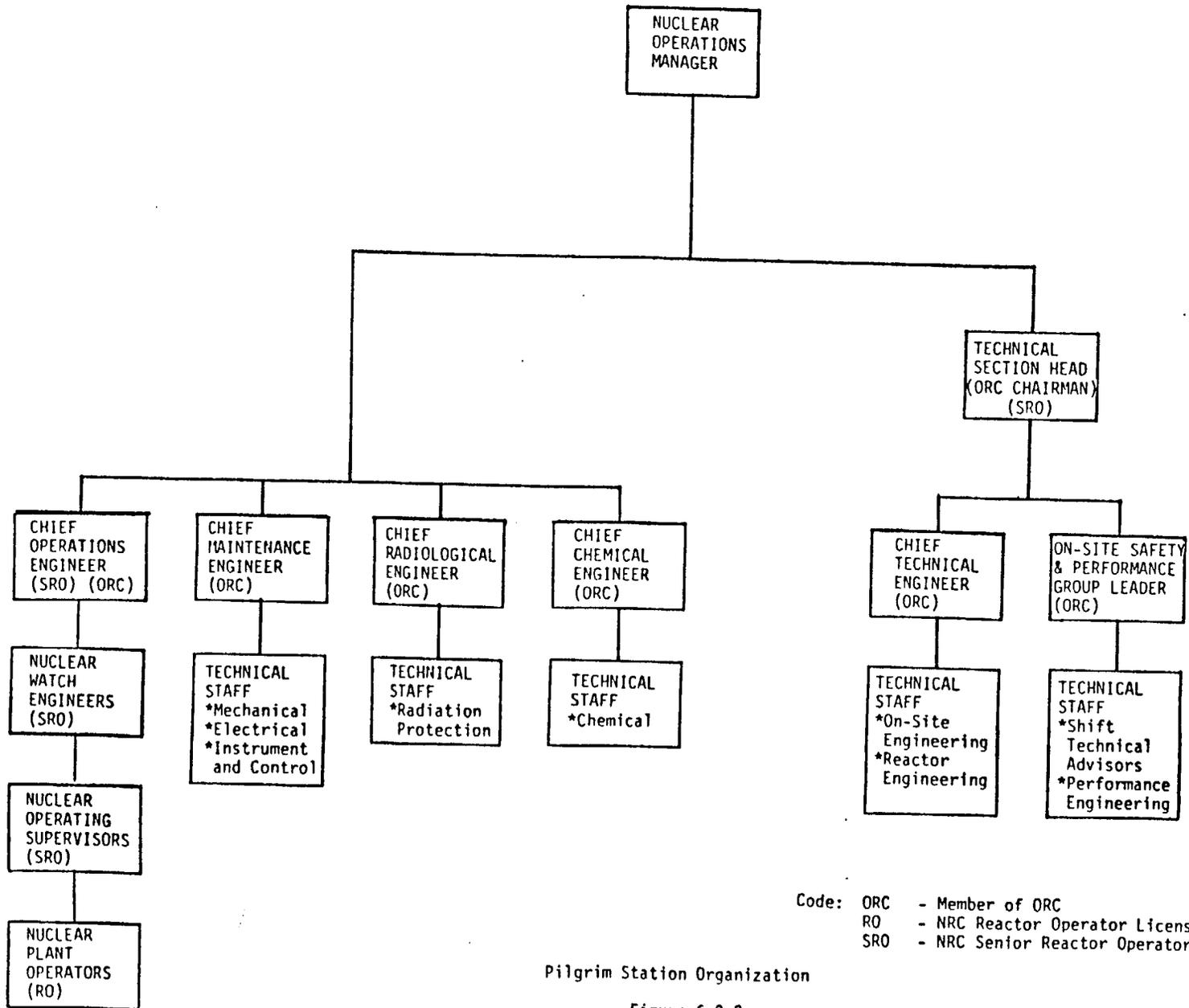
### 6.4 TRAINING

A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager. The training programs for the licensed personnel shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10CFR Part 55. The training programs for the Fire Brigade shall meet or exceed the requirements of NFPA Standard No. 27-1975 "Private Fire Brigade". Fire Protection Training sessions will be held quarterly.



Boston Edison Company -  
Organization for Operation of Pilgrim I

Figure 6.2.1



Code: ORC - Member of ORC  
 RO - NRC Reactor Operator License  
 SRO - NRC Senior Reactor Operator License

Pilgrim Station Organization

Figure 6.2.2

6.5 REVIEW AND AUDIT

A. OPERATIONS REVIEW COMMITTEE (ORC)

1. FUNCTION

The ORC shall function to advise the Nuclear Operations Manager on all matters related to safety.

2. COMPOSITION

The ORC shall be composed of the:

Chairman: Technical Section Head

Members: Chief Operating Engineer

Chief Maintenance Engineer

Chief Technical Engineer

Chief Radiological Engineer

Chief Chemical Engineer

Onsite Safety and Performance Group Leader

3. ALTERNATES

Alternates shall be appointed in writing by the Nuclear Operations Manager to serve on a temporary basis; however, no more than two alternates shall participate as voting members in (ORC) at any one time.

4. MEETING FREQUENCY

The ORC shall meet at least once per calendar month and as convened by the ORC Chairman.

5. QUORUM

The minimum quorum of the (ORC) necessary for the performance of the (ORC) responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

6. RESPONSIBILITIES

The ORC shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto that affect nuclear safety.

6. RESPONSIBILITIES (Cont.)

- b. Review all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Review of facility operations to detect potential safety hazards.
- f. Review of the Station Security Plan and implementing procedures and changes to the plan and procedures.
- g. Review of the Emergency Plan and implementing procedures and changes to the plan and procedures.
- h. Performance of special reviews and investigations and reports thereon as requested by the NSRAC Chairman.
- i. Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Nuclear Operations Manager, the NSRAC Chairman, and the Vice President - Nuclear Operations.
- j. Review the Station Fire Protection Plan and implementing procedures and changes to the plan and procedures.

The ORC Chairman may appoint subcommittees composed of personnel who are not members of ORC to perform staff work necessary to the efficient functioning of ORC.

7. AUTHORITY

- a. Recommend in writing to the Nuclear Operations Manager approval or disapproval of items considered under 6.5.A.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.A.6(a) through (d) above constitutes an unreviewed safety question.
- c. Provide immediate written notification to the Nuclear Operations Manager, the Nuclear Safety Review and Audit Committee and the Vice President - Nuclear Operations, of disagreement between the ORC Members and the ORC Chairman. The Nuclear Operations Manager shall have responsibility for resolution for such disagreements.

8. RECORDS

The ORC shall maintain written Minutes of each meeting and copies shall be forwarded to the Nuclear Operations Manager, the Nuclear Safety Review and Audit Committee Chairman, and the Vice President - Nuclear Operations.

B. NUCLEAR SAFETY REVIEW AND AUDIT COMMITTEE (NSRAC)

1. FUNCTION

The NSRAC shall function to provide independent review and audit of designated activities in the areas of:

1. nuclear power plant operations;
2. nuclear engineering;
3. chemistry and radiochemistry;
4. metallurgy;
5. instrumentation and control;
6. radiological safety;
7. mechanical and electrical engineering;
8. quality assurance practices
9. fire protection

2. COMPOSITION

The NSRAC Chairman and other members shall be appointed by the Senior Vice President - Nuclear, or such other person as he shall designate. NSRAC members shall collectively possess experience and competence required to review and audit the designated areas noted in 6.5.B.1.

The collective competence of the committee will be maintained as changes to the membership are made. The membership shall consist of a minimum of five persons.

3. ALTERNATES

Alternate members shall be appointed in writing by the Senior Vice President - Nuclear or the chairman to serve on a temporary basis; however, no more than two alternates shall participate in a quorum at any one time.

4. CONSULTANTS

Consultants shall be utilized as determined by the NSRAC Chairman to provide expert advice to the NSRAC.

5. MEETING FREQUENCY

The NSRAC shall meet at least once per six months.

6. QUORUM

A quorum of the NSRAC shall consist of the Chairman and a majority of the NSRAC members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

7. REVIEW

The NSRAC shall review:

- a. The safety evaluations for:
  - (1) Changes to procedures, equipment or systems and
  - (2) Tests or experiments completed under the provision of Section 50.59, 10 CFRto verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes in Technical Specifications or operating license.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that effect nuclear safety.
- g. All events which are required by 10 CFR 50.73 to be reported to the NRC in writing.
- h. Any other matter involving safe operation of the nuclear plant which NSRAC deems appropriate for consideration or which is referred to NSRAC for the onsite operating organization or by other functional organizational units within Boston Edison.
- i. Reports and meeting minutes of the Operations Review Committee.

8. AUDITS

Audits of facility activities shall be performed under the cognizance of the NSRAC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The training and qualifications of the entire facility staff at least once per year.

- c. The results of all actions required by deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.
- d. The performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per two years.
- e. The Emergency Plan and implementing procedures at least once per two years.
- f. The Station Security Plan and implementing procedures at least once per two years.
- g. Any other area of facility operation considered appropriate by the NSRAC or the Senior Vice President - Nuclear.
- h. The Fire Protection Program and implementing procedures at least once per two years.

9. AUTHORITY

The NSRAC shall report to and advise the Senior Vice President - Nuclear on those areas of responsibility specified in Section 6.5.B.7 and 6.5.B.8.

10. RECORDS

Records of NSRAC activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each NSRAC meeting shall be prepared, approved and forwarded to the Senior Vice President - Nuclear, NSRAC members, and others the Chairman may designate, within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.B.7 e, f, g and h above, shall be prepared, approved and forwarded to the Senior Vice President - Nuclear, with a copy to the Nuclear Operations Manager within 21 days following the completion of the review.
- c. Audit reports encompassed by Section 6.5.B.8 above shall be forwarded to the Senior Vice President - Nuclear and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE EVENT ACTION

The following actions shall be taken for each reportable event:

- A. The Commission shall be notified and/or a report submitted pursuant to the requirements of either 10 CFR 50.72 or 10 CFR 50.73.
- B. Each Reportable Event Report submitted to the Commission shall be reviewed by the ORC and submitted to the NSRAC Chairman and the Nuclear Operations Manager.

## 6.7 SAFETY LIMIT VIOLATION

The following actions shall be taken in the event a Safety Limit is violated:

- A. The provisions of 10 CFR 50.36(c) (1) (i) shall be complied with immediately.
- B. The Safety Limit Violation shall be reported to the Commission within 1 hour per 10CFR50.36(c)(6) and 50.72, and to the Nuclear Operations Manager and the NSRAC Chairman immediately.
- C. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the ORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- D. The Safety Limit Violation Report shall be submitted to the Commission within 30 days in accordance with 10CFR50.36(c)(7) and 50.73 and to the NSRAC Chairman and the Nuclear Operations Manager.

## 6.8 PROCEDURES

- A. Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7 - 1972 and Appendix "A" of USNRC Regulatory Guide 1.33, except as provided in 6.8.B and 6.8.C below.
- B. Each procedure of 6.8.A above, and changes thereto, shall be reviewed by the ORC and approved by the Nuclear Operations Manager prior to implementation. These procedures shall be reviewed periodically as set forth in administrative procedures.

NOTE: ORC review and approval of procedures for vendors/contractors, who have a QA Program approved by Boston Edison Company, is not required for work performed at the vendor/contractor facility.

- C. Temporary changes to procedures of 6.8.A above may be made provided:
  - 1. The intent of the original procedure is not altered.
  - 2. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's license on the unit affected.
  - 3. The change is documented, subsequently reviewed by the ORC within 7 days of implementation, and approved by the Nuclear Operations Manager.
- D. Written procedures to implement the Fire Protection Program shall be established, implemented and maintained.

## 6.9 REPORTING REQUIREMENTS

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the Director of the appropriate Regional Office of Inspection and Enforcement unless otherwise noted.

### Routine Reports

1. Startup Report. A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the tests identified in the FSAR and shall in general include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

2. Monthly Operating Report. Routine reports of operating statistics, shutdown experience and forced reductions in power shall be submitted on a monthly basis to Director, Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, to arrive no later than the 15th of each month following the calendar month covered by the report.

The Monthly Operating Report shall include a narrative summary of operating experience that describes the operation of the facility, including safety-related maintenance, for the monthly report period.

3. Occupational Exposure Tabulation. A tabulation of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions, e.g. reactor operations and surveillance inservice inspection, routine maintenance, special maintenance (including a description), waste processing, and refueling shall be submitted on an annual basis. This tabulation supplements the requirements of 20.407 of 10 CFR 20. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

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3. Special Reports

Special reports shall be submitted as indicated in Table 6.9.1.

6.10 RECORD RETENTION

A. The following records shall be retained for at least five years:

1. Records of facility operation covering time interval at each power level.
2. Records of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
3. Reportable Event Reports.
4. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
5. Records of reactor tests and experiments.
6. Records of changes made to Operating Procedures.
7. Records of radioactive shipments.
8. Records of sealed source leak tests and results.
9. Records of annual physical inventory of all source material of record.

B. The following records shall be retained for the duration of the Operating License:

1. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
2. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
3. Records of facility radiation and contamination surveys.
4. Records of radiation exposure for all individuals entering radiation control areas.
5. Records of the service lives of all hydraulic and mechanical snubbers listed on Tables 3.6.I(a) and 3.6.I(b) including the date at which the service life commences and associated installation and maintenance records.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NO. 88 TO FACILITY OPERATING LICENSE NO. DPR-35  
BOSTON EDISON COMPANY  
PILGRIM NUCLEAR POWER STATION  
DOCKET NO. 50-293

1.0 INTRODUCTION

Effective January 1, 1984, the Commission revised Section 50.72 of its regulations in 10 CFR Part 50, thereby modifying the immediate notification requirements for operating nuclear power reactors. At the same time, the Commission also added a new Section 50.73 which provides for a revised Licensee Event Report System. Guidance concerning implementation of the requirements of these sections was provided to the licensees in Generic Letter 83-43, which was issued by the staff on December 19, 1983. Enclosed with the generic letter were model Technical Specifications showing the revisions to be made to the licensees' Technical Specifications. In response to the Generic Letter, the Boston Edison Company (BECo) has proposed appropriate changes to the Technical Specifications (TS) for the Pilgrim Station in a letter dated October 16, 1984.

Additional changes to the TS Administrative Controls section were then proposed by BECo in a letter dated November 9, 1984 to be consistent with several recent changes in the BECo organization and position titles. This request was modified by a letter dated February 8, 1985, following discussions with the NRC staff.

We have reviewed the two above requests together in this Safety Evaluation because they both affect certain TS pages.

2.0 EVALUATION

The following changes in the Pilgrim Technical Specifications are proposed:

1. The term "reportable occurrence" would be replaced by "reportable event" in accordance with NRC guidance in GL 83-43.
2. The reporting requirements in Sections 3.6.D.3, 3.9.B.1, 3.9.B.4 and 3.9.B.5 would be deleted. This is acceptable since these requirements are adequately addressed by 10 CFR 50.72 and 10 CFR 50.73.
3. Section 3.9.B.2 would also be changed to delete the reporting requirement, but would require NRC notification within one hour when incoming power is not available from both startup and shutdown transformers and reactor operation is continuing at a reduced power level. This change is consistent with the requirements of 10 CFR 50.72 and is, therefore, acceptable.

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4. Throughout Section 6, the references to "Station Manager" have been changed to "Nuclear Operations Manager" to be consistent with a change in title for the on-site individual in charge of the station. We find this acceptable as there has been no change in responsibility for this position.
5. Section 6.2.A - BECo has revised the company organization under the Senior Vice President Nuclear by deleting the functions of the Director of Operations Review and the On-Site Safety and Performance Group Leader. The staff previously reporting to On-Site Safety & Performance Group Leader has been transferred to the Nuclear Operations Manager (see item 7 below). We find these changes acceptable as other organizational changes have obviated the need for these positions (see letter dated December 30, 1983, from William P. Harrington, BECo to Dr. Thomas E. Murley, NRC Region I).
6. Section 6.2.B - BECo has revised the Pilgrim Station Organization by establishing the new positions of Technical Section Head, to whom the Chief Technical Engineer and the On-Site Safety and Performance Group Leader now report, and of Chief Chemical Engineer. The Technical Section Head and the Chief Chemical Engineer report to the Nuclear Operations Manager. Figure 6.2.2 shows these changes and we find them acceptable.
7. A new TS Section 6.2.C would be added which states that "changes may be made to the organization without prior license amendment provided that a revision to Section 6.2 is included in a subsequent license amendment request." The licensee currently is allowed by Section 6.9.B.2.e to report within 30 days "any changes in corporate or station organization as described in Section 6.2." We find the change acceptable since that provision is currently in the Technical Specification. However, the 30-day reporting of such changes should be retained. The licensee has agreed to insertion of the words "The NRC is notified in writing within 30 days and" following the word "that" in the proposed section 6.2.C.
8. Section 6.5.A.2 - BECo proposes to revise the membership of the Operations Review Committee (ORC). The Technical Section Head would be the Chairman instead of the Nuclear Operations Manager (formerly Station Manager), and the new position of Chief Chemical Engineer would be added to the committee composition. This change is acceptable as it meets the acceptance criteria of Section 13.4 of NUREG-0800 (Standard Review Plan).
9. Section 6.5.A.3 - The statement concerning alternate members to the ORC would be revised deleting the phrase "However, no more than two alternates shall participate in an ORC quorum at any one time." We find this change acceptable as the substance of the phrase is reinserted in Section 6.5.A.5 (see below).

10. Section 6.5.A.5 - The quorum requirements would be revised to read "a quorum of the ORC shall consist of the Chairman or designated alternate and a majority of members/designated alternates; however, no more than two alternates shall be allowed to meet quorum requirements." We find this change acceptable as it meets the acceptance criteria of Section 13.4 of NUREG-0800 (Standard Review Plan).
11. Section 6.5.A.6 - BECo proposes: (1) to revise the responsibilities of the ORC to include reports to the Nuclear Operations Manager; (2) to renumber some of the subsections; and (3) to add a new paragraph that states "The ORC Chairman may appoint subcommittees composed of personnel who are not members of ORC to perform staff work necessary to the efficient functioning of ORC." We find these changes acceptable as they meet the acceptance criteria of Section 13.4 of NUREG-0800 Standard Review Plan.
12. Section 6.5.A.7 - BECo proposed to revise the authority of the ORC to read as follows:
  - a. Recommend in writing to the Nuclear Operations Manager approval or disapproval of items considered under 6.5.A.6(a) through (d) above.
  - b. Render determinations in writing with regard to whether or not each item considered under 6.5.A.6(a) through (d) above constitutes an unreviewed safety question.
  - c. Provide immediate written notification to the Nuclear Operations Manager, the Nuclear Safety Review and Audit Committee and the Vice President - Nuclear Operations, of disagreement between the ORC Members and the ORC Chairman. The Nuclear Operations Manager shall have responsibility for resolution for such disagreement.

We find this change acceptable as it conforms to ORC authority as described in the Standard Technical Specifications.
13. Section 6.5.A.8 - The records requirement for the ORC would be revised to add distribution to the Nuclear Operations Manager and the Nuclear Safety Review and Audit Committee Chairman. We find this change acceptable as it increases the distribution of ORC records to important individuals.
14. Section 6.5.B.7.g - The responsibilities of the Nuclear Safety Review and Audit Committee (NSRAC) would be revised to include the review of "all events which are required by 10 CFR 50.73 to be reported to the NRC in writing." We find this change acceptable as it reflects changes to 10 CFR 50 and is consistent with the Standard Technical Specifications.

15. Section 6.6 - The reportable occurrence notification would be changed to be "pursuant to the requirements of 10 CFR 50.72 or 10 CFR 50.73" and the title of this section would be changed to "Reportable Event Action". We find these changes acceptable as they reflect current regulations and the revised organization.
16. Section 6.7.B - Part B of this section on Safety Limit Violation would be revised to read "The Safety Limit Violation shall be reported to the Commission within one hour per 10 CFR 50.36(c)(6) and 50.72 and to the Nuclear Operations Manager and the NSRAC Chairman immediately." We find this change acceptable as it provides the reporting described in Section 6.7 of the Standard Technical Specifications.
17. Section 6.7.D - Part D of this section on Safety Limit Violations would be revised to "the Safety Limit Violation Report shall be submitted to the Commission within 30 days in accordance with 10 CFR 50.36(c)(7) and 50.73 and to the NSRAC Chairman and the Nuclear Operations Manager." We find this change acceptable since it conforms to the regulations cited.
18. Section 6.9.B concerning reporting requirements for reportable occurrences (events) would be deleted since it has been superseded by 10 CFR 50.73 which provides for a Licensee Event Report System.

### 3.0 Summary

All of changes proposed by the licensee, as modified by the February 8, 1985 submittal, have been reviewed and we have found them acceptable, with the exception noted in item 7 above. As indicated in the evaluation of the proposed change therein, the 30-day notification of organizational changes will be retained.

### 4.0 ENVIRONMENTAL CONSIDERATIONS

This amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

### 5.0 CONCLUSION

We have concluded, based on the considerations discussed above, that:  
(1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) 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.

Principal Contributor: F. Allenspach and P. H. Leech

Dated: August 14, 1985