Dochet File DMB-016

December 10, 1981



Docket No. 50-293

Mr. A. Victor Morisi Boston Edison Company M/C Nuclear 800 Boylston Street Boston, MA 02199

Dear Mr. Morisi:

The Commission has issued the enclosed Amendment No. 51 to Facility Operating License No. DPR-35 for the Pilgrim Nuclear Power Station Unit 1. This amendment consists of changes to the Technical Specifications in response to your letter BECo #81-257 dated November 4, 1981. This amendment was authorized by telephone on November 4, 1981 and was confirmed by letter dated November 5, 1981.

The amendment grants relief from the requirements of the Technical Specifications (3.7.B.l.c, 3.7.B.l.e, 3.7.B.2.a, and 3.7.B.2.c) regarding the operability requirements for the Standby Gas Treatment System and the Control Room High Efficiency Air Filtration System for the initiation of fuel movement and during fuel handling operations for the period November 4, 1981 through November 24, 1981.

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

Sincerely,

Kenneth T. Eccleston, Project Manager **Operating Reactors Branch #2** Division of Licensing Enclosures: **DISTRIBUTION:** 1. Amendment No. 51 to DPR-35 DSB(1)Docket File 2. Safety Evaluation D. Brinkman NRC PDR 3. Notice Local PDR ACRS(10)ORB#2 Rdg OPA(C. Miles) cc: w/enclosures D. Eisenhut R. Diggs See next page S. Norris NSIC M. Williams TERA K. Eccleston 0ELD I&E(4)A. Rosenthal, ASLAB T. Barnhart(4) Schneider ر 8112280085 811210 the PDR ADOCK 05000293 al set PDR wind m ⊿ÅD:DL 0RB#2 ORB#2 /04 OFFICE SNOPPTS KEccleston: pob b**ol i**to FNova JCHANDLER SURNAME 681 30781 *1.30*/81 DATE OFFICIAL RECORD COPY USGPO: 1981-335-960 NRC FORM 318 (10-80) NRCM 0240

Mr. A. Victor Morisi Boston Edison Company

cc:

Mr. Richard D. Machon Pilgrim Station Manager Boston Edison Company RFD #1, Rocky_Hill Road .Plymouth, Massachusetts 02360

Resident Inspector c/o U.S. NRC P.O. Box 867 Plymouth, Massachusetts 02360

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Massachusetts Department of Public Health ATTN: Commissioner of Public Health 600 Washington Street Boston, Massachusetts 02111

Water Quality & Environmental Commissioner Department of Environmental Quality Engineering 100 Cambridge Street Boston, Massachusetts 02202

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

Ms. JoAnn Shatwell Office of the Attorney General Environmental Protection Division 1 Ashburton Place 19th Floor Boston, Massachusetts 02108 U. S. Environmental Protection Agency Region I Office Regional Radiation Representative JFK Federal Building Boston, Massachusetts 02203



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

BOSTON EDISON COMPANY

DOCKET NO. 50-293

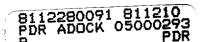
PILGRIM NUCLEAR POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 51 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 November 4, 1981 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 and paragraph 3.B of Facility Operating License No. DPR-35 is hereby amended to read as follows:
 - "3.B Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 51, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications."



FOR THE NUCLEAR REGULATORY COMMISSION

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Thomas A. Ippolito, Chief Operating Reactors Branch #2 Division of Licensing

Attachment: Changes to the Technical Specifications

Date of Issuance: December 10, 1981

ATTACHMENT TO LICENSE AMENDMENT NO. 51 -FACILITY OPERATING LICENSE NO. DPR-35

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158B 158C

Revise Appendix A as follows:

Remove the following pages and insert identically numbered pages:

- 3.7.B <u>Standby Gas Treatment</u> tem and <u>Control Room With Efficie</u> Air <u>Filtration System</u>
 - 1. Standby Gas Treatment System
 - a. Except as specified in 3.7.B.l.c below, both trains of the standby gas treatment system and the diesel generators required for operation of such trains shall be operable at all times when secondary containment integrity is required or the reactor shall be shutdown in 36 hours.
 - b. (1.) The results of the inplace cold DOP tests on HEPA filters shall show >99% DOP removal. The results of halogenated hydrocarbon tests on charcoal adsorber banks shall show >99% halogenated hydrocarbon removal.
 - (2.) The results of the laboratory carbon sample analysis shall show >95% methyl iodide removal at a velocity within 10% of system design, 0.5 to 1.5 mg/m³ inlet methyl iodide concentration. >70% R.H. and >190°F.
 - * c. From and after the date that one train of the Standby Gas Treatment System is made or found to be inoperable for any reason, continued reactor operation or fuel \ handling is permissible only during the succeeding seven days providing that within 2 hours and daily thereafter, all active components of the other standby gas treatment train shall be demonstrated to be operable.
 - d. Fans shall operate within +10% of 4000 cfm.

*Conditional Relief granted from this LCO for the period November 4 through November 24, 1981

- 4.7.8 <u>Standby</u> is <u>Treatment System and</u> <u>Control visit</u> <u>High Efficiency</u> Air <u>Filtretion System</u>
 - 1. Standby Gas Treatment System
 - a. (1.) At least once every 18 months, it shall be demonstrated that pressure drop across the combined high efficiency filters and charcoal adsorber banks is less than 8 inches of water at 4000 cfm.
 - (2.) At least once every 18 months, demonstrate that the inlet heaters on each train are operable and are capable of an output of at least 14 kW. Perform an instrument functional test on the humidistats controlling the heaters.
 - (3.) The tests and analysis of Specification 3.7.B.1.b.2 shall be performed at least once every 18 months or following painting, fire or chemical release in any ventilation zone communicating with the system while the system is operating that could contaminate the HEPA filters or charcoal adsorbers.
 - (4.) At least once every 18 months, automatic initiation of each branch of the standby gas treatment system shall be demonstrated, with Specification 3.7.8.1.d satisfied.
 - (5.) Each train of the standby gas treatment system shall be operated for at least 15 minutes per month.
 - (6.) The tests and analysis of Specification 3.7.B.1.b.(2) shall be performed after every 720 hours of system operation.

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3.7.3 (Continued)

- *e. Except as specified in 3.7.B.l.c, both trains of the standby gas treatment - system shall be operable during fuel handling operations. If the system is not operable fuel movement shall not be started (any fuel assembly movement in progress may be completed).
- 4.7.B (Constitute)
 - b. (1.) Inplace cold DOP testing shall be performed on the HEPA filters after each completed or partial replacement of the HEPA filter bank and after any structural maintenance on the HEPA filter system housing which could affect the HEPA filter bank bypass leakage.
 - (2.) Halogenated hydrocarbon testing shall be performed on the charcoal adsorber bank after each partial or complete replacement of the charcoal adsorber bank or after any structural maintenance on the charcoal adsorber housing which could affect the charcoal adsorber bank bypass leakage.

*Conditional Relief granted from this LCO for the period November 4 through November 24, 1981

Amendment No. 50, 51

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- 3.7.B (Continued)
 - 2. Control Room High Efficiency Air Filtration System
 - *a. Except as specified in Specification 3.7.B.2.c below, both trains of the Control Room High Efficiency Air Filtration System used for the processing of inlet air to the control room under accident conditions and the diesel generator(s) required for operation of each train of the system shall be operable whenever secondary containment integrity is required and during fuel handling operations.
 - (1.) The results of the inplace cold DOP tests on HEPA filters shall show >99% DOP removal. The results of the halogenated hydrocarbon tests on charcoal adsorber banks shall show >99% halogenated hydrocarbon removal when test results are extrapolated to the initiation of the test.
 - (2.) The results of the laboratory carbon sample analysis shall show >95% methyl iodide removal at a velocity within 10% of system design, 0.05 to 0.15 mg/m³ inlet methyl iodide concentration, >70% R.H., and >125°F.
 - *c. From and after the date that one train of the Control Room High Efficiency Air Filtration System is made or found to be incapable of supplying filtered air to the control room for any reason, reactor operation or refueling operations are permissible only during the succeeding 7 days. If the system is not made fully operable within 7 days, reactor
 - *Conditional Relief granted from this LCO for the period November 4 through November 24, 1981

- 4.7.8 (Con) we
 - 2. Control Room High Efficiency Air Filtration System
 - a. At least once every 18 months the pressure drop across each combined filter train shall be demonstrated to be less than 3 inches of water at 1000 cfm.
 - b. (1.) The tests and analysis of. Specification 3.7.B.2.b shall be performed once every 18 months or following painting, fire or chemical release in any ventilation zone communicating with the system while the system is operating.
 - (2.) Inplace cold_DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing which could affect the HEPA filter bank bypass leakage.
 - (3.) Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance on the system housing which could affect the charcoal adsorber bank bypass leakage.
 - (4.) Each train shall be operated with the heaters in automatic for at least 15 minutes every month.
 - (5.) The test and analysis of Specification 3.7.B.2.b.(2) shall be performed after every 720 hours of system operation.

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3.7.8 (Continued)

shutdown shall be initiated and the reactor shall be in cold shutdown within the next 36 hours and irradiated fuel handling operations shall be terminated within 2 hours. (Fuel handling operations in progress may be completed).

- 4.7.B (Contrined)
 - c. At least once every 18 months the following shall be demonstrated:
 - Automatic initiation of the control room high efficiency air filtration system.
 - (2) Operability of heaters at rated power.
- 3. Perform an instrument functional test on the humidistate controlling the heaters.

Amendment No. 50, 51



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 51 TO LICENSE NO. DPR-35

BOSTON EDISON COMPANY

DOCKET NO. 50-293

PILGRIM NUCLEAR POWER STATION UNIT 1

1.0 INTRODUCTION

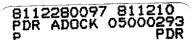
By letter dated November 4, 1981 (BECo. 81-257), the Boston Edison Company (licensee) requested relief from the requirements of the Technical Specifications (Section 3.7.B.1.c, 3.7.B.1.e, 3.7.B.2.a., and 3.7.B.2.c) regarding the operability requirements for the Standby Gas Treatment System and the Control Room High Efficiency Air Filtration System for the initiation of and during fuel movement in refueling operations.

2.0 BACKGROUND

A recent engineering analysis was performed by Boston Edison in response to Inspection and Enforcement Bulletin 80-11 (Masonry Wall Design). This analysis has revealed the potential failure of 3 walls located in the Turbine Building due to High Energy Pipe Breaks Outside Containment*, Tornado Depressurization or Seismic events. The failure of the walls would impact certain safety systems which are required for refueling mode operations. These systems are the Standby Gas Treatment System, High Efficiency Control Room Air Filtration System, the Residual Heat Removal System, and the Standby Liquid Control System. Their failure would be caused by the loss of the power cables in a raceway on the wall. The Licensee has declared the first two of these systems to be inoperable due to this potential failure mode and has developed a corrective design modification to remedy the deficiency. However, the modifications will not be completed until December 1, 1981.

The fuel loading schedule and subsequent plant start-up from the refueling outage would be impacted unless the modifications can be done in parallel with the fuel loading. However the current Technical Specifications do not allow the initiation of loading without full operability of the Standby Gas Treatment System and they also require the operability of the Control Room High Efficiency Air Filtration System during fuel handling operations. Each system also possesses Limiting Conditions for Operation, with one train inoperable, which are less than the time needed to complete the wall modifications. Therefore, the licensee has requested relief from the current requirements, on the basis of providing interim compensating measures, for the period of November 4 through November 24, 1981, for fuel loading.

*Wall failure from HELB is not feasible in cold shutdown.



3.0 EVALUATION

The review of the safety concerns is divided into three areas. First, it is shown that the probability of an event (Seismic or Tornado) during fuel handling operations is small. Second, the licensee's compensating measures provide adequate assurance that the system will be available if needed to mitigate the consequences of a fuel handling accident. Third, that the systems are not required to limit offsite doses within those of 10 CFR 100.

The licensee has evaluated the probability of a fuel handling accident in conjunction with a block wall failure. The total probability was determined to be $1.0 \times 10E-5$ /refueling. The NRC staff has also conservatively estimated the probability of block wall failure while handling fuel and the estimate is comparable to that of Boston Edison.

The licensee has committed to the following compensating actions while the single train of each of the two systems is declared inoperable:

- The Standby Gas Treatment System (Train B) and the Control Room High Efficiency Air Filtration System (Train B) train will be continuously operated during all irradiated fuel handling activities. Train B of the Standby Gas Treatment System has valve MO-N-113 disconnected (ie. failed) in the open position to ensure system function in the event of a wall failure. These systems will be monitored to assure operability and irradiated fuel handling operations will be terminated if either of the systems (Train B) is found or made to be inoperable.
- 2. The RHR system will be restored to full functional status immediately upon failure of the wall. The licensee will have procedures in place prior to fuel movement which direct actions to restore the functional capability of the RHR system. Subsequent to procedure execution, only a protective feature of one set of RHR pumps will be inoperative with all other shutdown cooling system features fully operable. The failure of this pump protective feature was determined by the licensee to be the only concern during this mode of operations.
- 3. A procedure will be in place prior to the start of fuel movement, which requires the immediate termination of fuel handling (moves in progress may be completed) in the event that a Tornado Watch is issued in the area of the plant.

No compensatory actions are necessary for the Standby Liquid Control System since the Licensee has demonstrated that the system will perform its intended function if required. This system is required during control rod drive testing during loading.

The licensee has evaluated the radiological effects of a fuel handling accident assuming that the SGTS is inoperable. It has been determined that if the fuel movement takes places more than 120 hours after reactor shutdown, the limits of 10 CFR 100 regarding doses at the site boundary would not be exceeded. The subject fuel movement will not be initiated prior to 120 hours after reactor shutdown.

We have determined that the licensee has provided adequate assurance regarding accident mitigation during the period necessary to complete the fuel loading. Therefore, we grant the requested relief from the Technical Specifications 3.7.B.1.c, 3.7.B.1.e, 3.7.B.2.a., and 3.7.B.2.c for the period from November 4 through November 24, 1981.

4.0 ENVIRONMENTAL CONSIDERATIONS

We have determined that the amendment does not involve 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 Section 51.5(d)(4) that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of the amendment.

5.0 CONCLUSIONS

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the amendment does 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 the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: December 10, 1981

UNITED STATES NUCLEAR REGULATORY COMMISSION DOCKET NO. 50-293

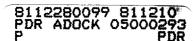
BOSTON EDISON COMPANY

NOTICE OF ISSUANCE OF AMENDMENT TO FACILITY OPERATING LICENSE

The U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 51 to Facility Operating License No. DPR-35 issued to Boston Edison Company (the Licensee) which revised the Technical Specifications for operation of the Pilgrim Nuclear Power Station Unit No. 1 (the facility) located near Plymouth, Massachusetts. The amendment was authorized by telephone on November 4, 1981 and was confirmed by letter dated November 5, 1981; therefore, the amendment became effective November 4, 1981.

The amendment grants relief from the requirements of the Technical Specifications (3.7.B.1.c, 3.7.B.1.e, 3.7.B.2.a, and 3.7.B.2.c) regarding the operability requirements for the Standby Gas Treatment System and the Control Room High Efficiency Air Filtration System for the initiation of fuel movement and during fuel handling operations for the period November 4, 1981 through November 24, 1981.

The application for 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 it does not involve a significant hazards consideration:



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

For further details with respect to this action, see (1) the application for amendment dated November 4, 1981, (2) Amendment No. 51 to License No. DPR-35 and (3) the Commission's related Safety Evaluation. All of these items are we 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 Licensing. Dated at Bethesda, Maryland this 10th day of December, 1981.

FOR THE NUCLEAR REGULATORY COMMISSION

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Thomas *K*. Ippolito, Chief Operating Reactors Branch #2 Division of Licensing