

February 12, 1990

Mr. Ralph G. Bird
Senior Vice President - Nuclear
Boston Edison Company
Pilgrim Nuclear Power Station
RFD #1 Rocky Hill Road
Plymouth, Massachusetts 02360

Dear Mr. Bird:

SUBJECT: ISSUANCE OF AMENDMENT NO.128 TO FACILITY OPERATING LICENSE NO.
DPR-35 - PILGRIM NUCLEAR POWER STATION (TAC NO.75493)

The Commission has issued the enclosed Amendment No.128 to Facility Operating License No. DPR-35 for the Pilgrim Nuclear Power Station. This amendment is in response to your application dated December 7, 1989.

This amendment replaces the existing Pilgrim Technical Specification definition of surveillance frequency with a new definition which is consistent with the guidance provided in Generic Letter (GL) 89-14, "Line-Item Improvements In Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals." The proposed change also moves the definition of an operating cycle from the definition of surveillance frequency to the definition of surveillance interval. This places the definition under the proper heading and adds to the clarity of the definition of the surveillance frequency.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register Notice.

Sincerely,

Daniel G. McDonald, Senior Project Manager
Project Directorate I-3
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 128 to License No. DPR-35
- 2. Safety Evaluation

cc w/enclosures:
See next page

[AMEND.PKG.T75493 PILGRIM]

*See previous concurrence

DFOI

OFC	:PDI-3/PM*	:PDI-3/LA*	:OGC *	:PDI-3/D	:	:	:	:
NAME	:DGMcDonald	:MRushbrook	:hmb	:RHWessman	:	:	:	:ll
DATE	:01/03/90	:01/04/90	:1/16/90	:1/29/90	:	:	:	:

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* See concurrence
conditioned on holding
PAC App until 30 day show by
Notice Period Expires

CP-1

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

151

Richard H. Wessman, Director
Project Directorate I-3
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: February 12, 1990

OFFICE :	PDI-3/PM	PDI-3/LA	OGC	PDI-3/D	:	:	:
NAME :	DGMcDonald	MRushbrook	BMB	RHWessman	:	:	:
DATE :	01/03/89	01/14/89	01/16/89	01/25/89	:	:	:

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See Condition
of Conference
by of letter



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

February 12, 1990

Docket No. 50-293

Mr. Ralph G. Bird
Senior Vice President - Nuclear
Boston Edison Company
Pilgrim Nuclear Power Station
RFD #1 Rocky Hill Road
Plymouth, Massachusetts 02360

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Sincerely,

A handwritten signature in cursive script, reading "Daniel G. McDonald".

Daniel G. McDonald, Senior Project Manager
Project Directorate I-3
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No.128 to License No. DPR-35
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. Ralph G. Bird

cc w/enclosure:

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AMENDMENT NO. 128 TO DPR-35 PILGRIM NUCLEAR POWER STATION DATED February 12, 1990

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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. 128
License No. DPR-35

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment filed by the Boston Edison Company (the licensee) dated December 7, 1989 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 set forth in 10 CFR Chapter I;
 - 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:

Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 128, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

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3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Richard H. Wessman, Director
Project Directorate I-3
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: February 12, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 128

FACILITY OPERATING LICENSE NO. DPR-35

DOCKET NO. 50-293

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

Remove

5a

5b

Insert

5a

5b

1.0 DEFINITIONS (Continued)

- U. Surveillance Frequency - Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

The Surveillance Frequency establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance schedule and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Definition "U" is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

- V. Surveillance Interval - The surveillance interval is the calendar time between surveillance tests, checks, calibrations, and examinations to be performed upon an instrument or component when it is required to be operable. These tests may be waived when the instrument, component, or system is not required to be operable, but the instrument, component, or system shall be tested prior to being declared operable. The operating cycle interval is 18 months and the 25% tolerance given in Definition "U" is applicable.
- W. Fire Suppression Water System - A fire suppression water system shall consist of: a water source(s); gravity tank(s) or pump(s); and distribution piping with associated sectionalizing control or isolation valves. Such valves shall include hydrant post indicator valves and the first valve ahead of the water flow alarm device on each sprinkler, hose standpipe or spray system riser.
- X. Staggered Test Basis - A staggered test basis shall consist of: (a) a test schedule for n systems, subsystems, trains, or other designated components obtained by dividing the specified test interval into n equal subintervals; (b) the testing of one system, subsystem, train or other designated components at the beginning of each subinterval.
- Y. Source Check - A source check shall be the qualitative assessment of channel response when the channel sensor is exposed to a radioactive source.

1.0 DEFINITIONS (Continued)

- Z. Offsite Dose Calculation Manual (ODCM) - An offsite dose calculation manual (ODCM) shall be a manual containing the current methodology and parameters to be used for the calculation of offsite doses due to radioactive gaseous and liquid effluents, the calculation of gaseous and liquid effluent monitoring instrumentation alarm/trip setpoints, and the conduct of the Radiological Environmental Monitoring Program.
- AA. Action - Action shall be that part of a specification which prescribes remedial measures required under designated conditions.
- BB. Member(s) of the Public¹ - Member(s) of the public shall include all persons who are not occupationally associated with the plant. This category does not include employees of the utility, its contractors, or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational or other purposes not associated with the site.
- CC. Site Boundary¹ - The site boundary is shown in Figure 1.6-1 in the FSAR.
- DD. Radwaste Treatment System
1. Gaseous Radwaste Treatment System - The gaseous radwaste treatment system is that system identified in Figure 4.8-2.
 2. Liquid Radwaste Treatment System - The liquid radwaste treatment system is that system identified in Figure 4.8-1.
- EE. Automatic Primary Containment Isolation Valves - Are primary containment isolation valves which receive an automatic primary containment group isolation signal.

¹ See FSAR Figure 1.6-1



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 128 TO FACILITY OPERATING LICENSE NO. DPR-35
BOSTON EDISON COMPANY
PILGRIM NUCLEAR POWER STATION
DOCKET NO. 50-293

1.0 INTRODUCTION

By letter dated December 7, 1989, the Boston Edison Company (the licensee) proposed changes to the technical specifications (TS) for the Pilgrim Nuclear Power Station. The proposed changes will change the definition of surveillance frequency which limits the combined time interval for three consecutive surveillances to less than 3.25 times the specified interval. Guidance on this proposed change to the TS was provided to all power reactor licensees and applicants by Generic Letter 89-14 dated August 21, 1989.

The proposed change will also move the definition of an operating cycle from the definition of surveillance frequency to the definition of surveillance interval. This change places it under the proper heading.

2.0 EVALUATION

The definition of surveillance frequency includes the provision that allows a surveillance interval to be extended by 25 percent of the specified time interval. This extension provides flexibility for scheduling the performance of surveillances and to permit consideration of plant operating conditions that may not be suitable for conducting a surveillance at the specified time interval. Such operating conditions include transient plant operation or ongoing surveillance or maintenance activities. The current definition of surveillance frequency further limits the allowance for extending surveillance intervals by requiring that the combined time interval for any three consecutive surveillances not exceed 3.25 times the specified time interval. The purpose of this provision is to assure that surveillances are not extended repeatedly as an operational convenience resulting in an overall increase in the surveillance interval.

Experience has shown that the 18-month surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25-percent allowance for extending surveillances that are performed on a refueling outage basis.

Extending surveillance intervals during plant operation can also result in a benefit to safety when a scheduled surveillance is due at a time that is not suitable for conducting the surveillance. This may occur when transient plant operating conditions exist or when safety systems are out of service for maintenance or other surveillance activities. In such cases, the benefit to safety of extending a surveillance interval would exceed any safety benefit derived by limiting the use of the 25-percent allowance to extend a surveillance. Furthermore, there is the administrative burden associated with tracking the use of the 25-percent allowance to ensure compliance with the 3.25 limit.

In view of these findings, the staff concluded that the 3.25 limit for all surveillances should be removed because its removal will have an overall positive effect on safety. The guidance provided in Generic Letter 89-14 recommended a change that removes the 3.25 limit on three consecutive surveillances. The definition was also updated to note that, it is not the intent of the allowance for extending surveillance intervals be used repeatedly merely as an operational convenience to extend surveillance intervals beyond that specified.

Moving the definition of operating cycle from surveillance frequency to surveillance interval placed the definition under the proper heading. This proposed change also adds to the clarity of the definition of surveillance frequency.

The licensee's proposed changes to the definition of surveillance frequency is consistent with the guidance provided in Generic Letter 89-14, as noted above, and moving the definition of operating cycle adds clarity and placed it under the proper heading. On the basis of its review of this matter, the staff finds that the above changes to the Pilgrim Technical Specifications are acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves changes in requirements with respect to the use of facility components located within the restricted area as defined in 10 CFR Part 20 and surveillance requirements. The Staff has determined that the amendment involves no significant increase in the amounts and no significant changes in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational exposure. The staff has determined that the amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). 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.

4.0 CONCLUSION

The Commission's determination that the amendment involves no significant hazards consideration was published in the Federal Register (55 FR 929) on January 10, 1990. No public comments were received, and the Commonwealth of Massachusetts did not have any comments.

On the basis of the considerations discussed above, the staff concludes that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) 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 Contributors: T. Dunning
D. McDonald

Dated: February 12, 1990