

May 5, 1994

Docket No. 50-293

Mr. E. Thomas Boulette, Ph.D
Senior Vice President - Nuclear
Boston Edison Company
Pilgrim Nuclear Power Station
RFD #1 Rocky Hill Road
Plymouth, Massachusetts 02360

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Dear Mr. Boulette:

SUBJECT: ISSUANCE OF AMENDMENT NO. 152 TO FACILITY OPERATING LICENSE NO. DPR-35, PILGRIM NUCLEAR POWER STATION (TAC NO. M88081)

The Commission has issued the enclosed Amendment No. 152 to Facility Operating License No. DPR-35 for the Pilgrim Nuclear Power Station. This amendment is in response to your application dated October 19, 1993.

This amendment removes the low condenser vacuum scram and reduces the turbine first stage setpoint at which it is permissible to bypass the turbine control valve fast closure and the turbine stop valve closure trip (scram) signals.

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

Sincerely,

Original signed by:

Ronald B. Eaton, Senior Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 152 to License No. DPR-35
2. Safety Evaluation

cc w/enclosures:
See next page

94-81 P/s

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 5, 1994

Docket No. 50-293

Mr. E. Thomas Boulette, Ph.D
Senior Vice President - Nuclear
Boston Edison Company
Pilgrim Nuclear Power Station
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Sincerely,

A handwritten signature in black ink, appearing to read "Ronald B. Eaton".

Ronald B. Eaton, Senior Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 152 to License No. DPR-35
2. Safety Evaluation

cc w/enclosures:
See next page

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Pilgrim Nuclear Power Station

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

BOSTON EDISON COMPANY

DOCKET NO. 50-293

PILGRIM NUCLEAR POWER STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 152
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 October 19, 1993, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations;
 - 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:

Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 152, 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 its date of issuance and shall be implemented coincidental with the corresponding plant design change.

FOR THE NUCLEAR REGULATORY COMMISSION



Walter R. Butler, 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: May 5, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 152

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.

<u>Remove</u>	<u>Insert</u>
2	2
3	3
27	27
29	29
30	30
32	32
35	35
38	38

1.0 DEFINITIONS (Cont'd)

E. Operable - Operability

A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

F. Operating - Operating means that a system or component is performing its intended functions in its required manner.

G. Immediate - Immediate means that the required action will be initiated as soon as practicable considering the safe operation of the unit and the importance of the required action.

H. Reactor Power Operation - Reactor power operation is any operation with the mode switch in the "Startup" or "Run" position with the reactor critical and above 1% design power.

I. Hot Standby Condition - Hot standby condition means operation with coolant temperature greater than 212°F, system pressure less than 600 psig, the main steam isolation valves closed and the mode switch in startup.

J. Cold Condition - Reactor coolant temperature equal to or less than 212°F.

K. Mode - The reactor Mode is that which is established by the mode selector-switch. The modes include shutdown, refuel, startup and run which are defined as follows:

1. Startup Mode - In this mode the reactor protection scram trip, initiated by main steam line isolation

1.0 DEFINITIONS (cont'd)

- valve closure, is bypassed when reactor pressure is less than 600 psig, the low pressure main steam line isolation valve closure trip is bypassed, the reactor protection system is energized with IRM neutron monitoring system trips and control rod withdrawal interlocks in service.
2. Run Mode - In this mode the reactor system pressure is at or above 880 psig and the reactor protection system is energized with APRM protection and RBM interlocks in service.
 3. Shutdown Mode - The reactor is in the shutdown mode when the reactor mode switch is in the shutdown mode position and no core alterations are being performed.
 - a. Hot Shutdown means conditions as above with reactor coolant temperature greater than 212 F.
 - b. Cold Shutdown means conditions as above with reactor coolant temperature equal to or less than 212 F.
 4. Refuel Mode - The reactor is in the refuel mode when the mode switch is in the refuel mode position. When the mode switch is in the refuel position, the refueling interlocks are in service.
- L. Design Power - Design power means a steady-state power level of 1998 thermal megawatts.
- M. Primary Containment Integrity - Primary containment integrity means that the drywell and pressure suppression chamber are intact and all of the following conditions are satisfied:
1. All manual containment isolation valves on lines connected to the reactor coolant system or containment which are not required to be open during accident conditions are closed.
 2. At least one door in each airlock is closed and sealed.
 3. All blind flanges and manways are closed.
 4. All automatic primary containment isolation valves are operable or at least one containment isolation valve in each line having an inoperable valve shall be deactivated in the isolated condition.
 5. All containment isolation check valves are operable or at least one containment valve in each line having an inoperable valve is secured in the isolated position.
- N. Secondary Containment Integrity - Secondary containment integrity means that the reactor building is intact and the following conditions are met:

PNPS Table 3.1.1 REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENTATION REQUIREMENT

Operable Inst. Channels per Trip System (1) Minimum Avail.		Trip Function	Trip Level Setting	Modes in Which Function Must Be Operable			Action (1)
				Refuel (7)	Startup/Hot Standby	Run	
1	1	Mode Switch in Shutdown		X	X	X	A
1	1	Manual Scram		X	X	X	A
		IRM					
3	4	High Flux	≤120/125 of full scale	X	X	(5)	A
3	4	Inoperative		X	X	(5)	A
		APRM					
2	3	High Flux	(15)	(17)	(17)	X	A or B
2	3	Inoperative	(13)	X	X(9)	X	A or B
2	3	High Flux (15%)	≤15% of Design Power	X	X	(16)	A or B
2	2	High Reactor Pressure	≤1063.5 psig	X(10)	X	X	A
2	2	High Drywell Pressure	≤2.22 psig	X(8)	X(8)	X	A
2	2	Reactor Low Water Level	≥11.7 In. Indicated Level	X	X	X	A
		SDIV High Water Level:	≤38 Gallons	X(2)	X	X	A
2	2	East					
2	2	West					
2	2	Main Steam Line High Radiation	≤7x Normal Full Power Background (18)	X	X	X(18)	A or C
4	4	Main Steam Line Isolation Valve Closure	≤10% Valve Closure	X(3)(6)	X(3)(6)	X(6)	A or C
2	2	Turbine Control Valve Fast Closure	≥150 psig Control Oil Pressure at Acceleration Relay	X(4)	X(4)	X(4)	A or D
4	4	Turbine Stop Valve Closure	≤10% Valve Closure	X(4)	X(4)	X(4)	A or D

NOTES FOR TABLE 3.1.1 (Cont'd)

2. Permissible to bypass, with control rod block, for reactor protection system reset in refuel and shutdown positions of the reactor mode switch.
3. Permissible to bypass when reactor pressure is ≤ 576 psig.
4. Permissible to bypass when turbine first stage pressure is ≤ 112 psig.
5. IRM's are bypassed when APRM's are onscale and the reactor mode switch is in the run position.
6. The design permits closure of any two lines without a scram being initiated.
7. When the reactor is subcritical, fuel is in the reactor vessel and the reactor water temperature is less than 212°F , only the following trip functions need to be operable:
 - A. Mode switch in shutdown
 - B. Manual scram
 - C. High flux IRM
 - D. Scram discharge volume high level
 - E. APRM (15%) high flux scram
8. Not required to be operable when primary containment integrity is not required.
9. Not required while performing low power physics tests at atmospheric pressure during or after refueling at power levels not to exceed 5 MW(t).
10. Not required to be operable when the reactor pressure vessel head is not bolted to the vessel.
11. Deleted
12. Deleted
13. An APRM will be considered inoperable if there are less than 2 LPRM inputs per level or there is less than 50% of the normal complement of LPRM's to an APRM.
14. Deleted
15. The APRM high flux trip level setting shall be as specified in the CORE OPERATING LIMITS REPORT, but shall in no case exceed 120% of rated thermal power.
16. The APRM (15%) high flux scram is bypassed when in the run mode.
17. The APRM flow biased high flux scram is bypassed when in the refuel or startup/hot standby modes.
18. Within 24 hours prior to the planned start of hydrogen injection with the reactor power at greater than 20% rated power, the normal full power radiation background level and associated trip setpoints may be changed based on a calculated value of the radiation level expected during the injection of hydrogen. The background radiation level and associated trip setpoints may be adjusted based on either calculations or measurements of actual radiation levels resulting from hydrogen injection. The background radiation level shall be determined and associated trip setpoints shall be set within 24 hours of re-establishing normal radiation levels after completion of hydrogen injection and prior to withdrawing control rods at reactor power levels below 20% rated power.

TABLE 4.1.1
 REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENTATION FUNCTIONAL TESTS
 MINIMUM FUNCTIONAL TEST FREQUENCIES FOR SAFETY INSTRUMENTATION AND CONTROL CIRCUITS

	Functional Test	Minimum Frequency (3)
Mode Switch in Shutdown	Place Mode Switch in Shutdown	Each Refueling Outage
Manual Scram	Trip Channel and Alarm	Every 3 Months
RPS Channel Test Switch (5)	Trip Channel and Alarm	Once per week
IRM		
High Flux	Trip Channel and Alarm (4)	Once Per Week During Refueling and Before Each Startup
Inoperative	Trip Channel and Alarm	Once Per Week During Refueling and Before Each Startup
APRM		
High Flux	Trip Output Relays (4)	Every 3 Months (7)
Inoperative	Trip Output Relays (4)	Every 3 Months
Flow Bias	Trip Output Relays (4)	Every 3 Months
High Flux (15%)	Trip Output Relays (4)	Once Per Week During Refueling and Before Each Startup
High Reactor Pressure	Trip Channel and Alarm (4)	Every 3 Months
High Drywell Pressure	Trip Channel and Alarm (4)	Every 3 Months
Reactor Low Water Level	Trip Channel and Alarm (4)	Every 3 Months
High Water Level in Scram Discharge Tanks	Trip Channel and Alarm (4)	Every 3 Months
Main Steam Line High Radiation	Trip Channel and Alarm (4)	Every 3 Months
Main Steam Line Isolation Valve Closure	Trip Channel and Alarm	Every 3 Months
Turbine Control Valve Fast Closure	Trip Channel and Alarm	Every 3 Months
Turbine First Stage Pressure Permissive	Trip Channel and Alarm (4)	Every 3 Months
Turbine Stop Valve Closure	Trip Channel and Alarm	Every 3 Months
Reactor Pressure Permissive	Trip Channel and Alarm (4)	Every 3 Months

TABLE 4.1.2
 REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENT CALIBRATION
 MINIMUM CALIBRATION FREQUENCIES FOR REACTOR PROTECTION INSTRUMENT CHANNELS

Instrument Channel	Calibration Test (5)	Minimum Frequency (2)
IRM High Flux	Comparison to APRM on Controlled Shutdowns Full Calibration	Note (4) Once per Operating Cycle
APRM High Flux Output Signal Flow Bias Signal	Heat Balance Calibrate Flow Comparator and Flow Bias Network	Once every 3 Days At Least Once Every 18 Months
	Calibrate Flow Bias Signal (1)	Every 3 Months
LPRM Signal	TIP System Traverse	Every 1000 Effective Full Power Hours
High Reactor Pressure	Note (7)	Note (7)
High Drywell Pressure	Note (7)	Note (7)
Reactor Low Water Level	Note (7)	Note (7)
High Water Level in Scram Discharge Tanks	Note (7)	Note (7)
Main Steam Line Isolation Valve Closure	Note (6)	Note (6)
Turbine First Stage Pressure Permissive	Note (7)	Note (7)
Turbine Control Valve Fast Closure	Standard Pressure Source	Every 3 Months
Turbine Stop Valve Closure	Note (6)	Note (6)
Reactor Pressure Permissive	Note (7)	Note (7)

3.1 BASES (Cont'c)

The requirement that the IRM's be inserted in the core when the APRM's read 2.5 indicated on the scale assures there is proper overlap in the neutron monitoring systems and thus, sufficient coverage is provided for all ranges of reactor operation.

The provision of an APRM scram at $\leq 15\%$ design power in the Refuel and Startup/Hot Standby modes and the backup IRM scram at $\leq 120/125$ of full scale assures there is proper overlap in the Neutron Monitoring Systems and thus, sufficient coverage is provided for all ranges of reactor operation.

The APRM's cover the Refuel and Startup/Hot Standby modes with the APRM 15% scram, and the power range with the flow-biased rod block and scram. The IRM's provide additional protection in the Refuel and Startup/Hot Standby modes. Thus, the IRM and APRM 15% scram are required in the Refuel and Startup/Hot Standby modes. In the power range, the APRM system provides the required protection (Reference FSAR Section 7.5.7). Thus, the IRM system is not required in the Run mode.

The high reactor pressure, high drywell pressure, reactor low water level, and scram discharge volume high level scrams are required for Startup/Hot Standby and Run modes of plant operation. They are, therefore, required to be operational for these modes of reactor operation.

The requirement to have the scram functions, as indicated in Table 3.1.1, operable in the Refuel mode is to assure shifting to the Refuel mode during reactor power operation does not diminish the capability of the reactor protection system.

Below 176 psig (analytical limit) turbine first-stage pressure (45% of rated core thermal power for the most limiting balance-of-plant configuration), the scram signals due to turbine stop valve closure or fast closure of turbine control valves are bypassed because flux and pressure scram are adequate to protect the reactor. If the scram signal due to turbine stop valve closure or fast closure of turbine control valves is bypassed at lower powers, less conservative MCPR and MAPLHGR operating limits may be applied as specified in the CORE OPERATING LIMITS REPORT.

Average Power Range Monitor (APRM)

APRM's #1 and #3 operate contacts in one subchannel and APRM's #2 and #3 operate contacts in the other subchannel. APRM's #4, #5, and #6 are arranged similarly in the other protection trip system. Each protection trip system has one more APRM than is necessary to meet the minimum number required per channel. This allows the bypassing of one APRM per protection trip system for maintenance, testing, or calibration. Additional IRM channels have also been provided to allow for bypassing of one such channel.

3.1 BASES (Cont'd)

remains well above the safety limit MCPR in all cases, and system pressure does not reach the safety valve settings. The scram setting is approximately 15 inches below the normal operating range and is thus sufficient to avoid spurious scrams.

Turbine Stop Valve Closure

The turbine stop valve closure scram anticipates the pressure, neutron flux, and heat flux increase that could result from rapid closure of the turbine stop valves. With a scram trip setting of ≤ 10 percent of valve closure from full open, the resultant increase in surface heat flux is limited such that MCPR remains above the safety limit MCPR even during the worst case transient that assumes the turbine bypass is closed.

Turbine Control Valve Fast Closure

The turbine control valve fast closure scram anticipates the pressure, neutron flux, and heat flux increase that could result from fast closure of the turbine control valves due to load rejection exceeding the capability of the bypass valves. The reactor protection system initiates a scram when fast closure of the control valves is initiated by the acceleration relay. This setting and the fact that control valve closure time is approximately twice as long as that for the stop valves means that resulting transients, while similar, are less severe than for stop valve closure. MCPR remains above the safety limit MCPR.

Main Steam Line Isolation Valve Closure

The low pressure isolation of the main steam lines at 880 psig (as specified in Table 3.2.A) was provided to protect against rapid reactor depressurization and the resulting rapid cooldown of the vessel. Advantage is taken of the scram feature that occurs when the main steam line isolation valves are closed, to provide for reactor shutdown so that high power operation at low reactor pressure does not occur, thus providing protection for the fuel cladding integrity safety limit. Operation of the reactor at pressures lower than 785 psig requires the reactor mode switch be in the startup position where protection of the fuel cladding integrity safety limit is provided by the IRM high neutron flux scram and APRM 15% scram. Thus, the combination of main steam line low pressure isolation and isolation valve closure scram assures the availability of neutron flux scram protection over the entire



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 152 TO FACILITY OPERATING LICENSE NO. DPR-35
BOSTON EDISON COMPANY
PILGRIM NUCLEAR POWER STATION
DOCKET NO. 50-293

1.0 INTRODUCTION

By letter dated October 19, 1993, the Boston Edison Company (BECO) proposes to change Pilgrim Nuclear Power Station (PNPS) Appendix A of Operating License No. DRP-35 in accordance with 10 CFR 50.90. The proposed change is to physically remove the low condenser vacuum scram (LCVS) and remove reference of LCVS from the Technical Specifications (TSs).

The second change reduces the turbine first-stage pressure (TFSP) setpoint at which it is permissible to bypass the turbine control valve (TCV) fast closure and the turbine stop valve (TSV) closure trip (scram) signals. This change is made in response to information provided by the General Electric Company (GE) and using methodology consistent with Regulatory Guide (RG) 1.105 "Instrument Spans and Setpoints." (Ref. 1)

2.0 BACKGROUND

The purpose of the LCVS is to protect the main condenser from overpressure. A loss of condenser vacuum initiates a reactor scram, automatic closure of the TSV and turbine bypass valves. The trip setpoint, which is less than or equal to 23 inches Hg vacuum, is selected to initiate a scram before the closure of the TSV is initiated. The LCVS is only required during power operations and must be bypassed to start up the unit.

Both the TSV closure and the TCV fast closure reactor scram occur above 45% reactor thermal power. The TSV closure and TCV rapid closure at power results in a nuclear steam pressure increase that collapses steam voids which results in positive reactivity to the core. The TSV closure scram is initiated earlier than either the neutron monitoring system or nuclear system high-pressure scrams to provide a margin below thermal hydraulic limits for abnormal operational transients. The TCV fast closure at power also protects the fuel from damage.

3.0 EVALUATION

BECO has determined that the LCVS is an anticipatory scram and is not part of the PNPS design basis. It is not required to ensure the safe operation of PNPS and its removal will reduce the potential for spurious scrams. Therefore, this scram can be removed from PNPS and from reference to the TS. The TSV closure and TCV fast closure scrams will remain functional.

Either generator load rejection or turbine trip initiates closure of the TSV and fast closure of the TCV to protect the turbine. To protect the reactor from overpressure due to positive reactivity, a reactor scram is provided from either closure of the TSV or the rapid closure of the TCV. The bypass signal for the TSV closure scram and the TCV fast closure scram is generated from the TFSP. The pressure setpoint for the TFSP scram is currently 305 psig which corresponds to 45% of reactor rated thermal power. The scrams are bypassed when core power is less than 45% because the severity of pressurization transients is reduced; therefore, these scrams are not needed.

GE previously issued a Nuclear Service Information Letter (SIL) regarding the bypass setpoint for TSV closure and TCV rapid closure scrams (Ref. 2). The SIL recommended that two plant operating conditions needed to be considered when selecting the bypass setpoint for the TFSP scram:

1. During startup, when the feedwater heaters are out of service, the higher inlet sub-cooling results in lower steam flows and thus lower TFSP at a given reactor thermal power; and
2. During startup, when one or more turbine bypass valves are open, the TFSP will result in lower values at a given reactor thermal power.

The SIL recommended that setpoint drift and uncertainties be considered in developing calibration procedures and TS changes.

BECO has considered the above GE recommendations in selecting a new setpoint for the TFSP using methodology consistent with RG 1.105. This setpoint selection also considered the desirability of prevention of reactor safety relief valves from opening after a turbine trip at low power. The BECO analysis resulted in a maximum TFSP permitting scram signal bypass setting of 112 psig. This reduction of the TFSP from 305 psig to 112 psig provides a more conservative setting for the TSV closure and TCV rapid closure scram bypass setpoints, and will reduce the overpressure effects on scram actuation.

4.0 CONCLUSION

Based on the above, the NRC staff concludes that the licensee's analysis supporting TS changes for removal of the LCVs scram and reduction in setpoint for bypass of TCV fast closure and TSV closure scrams is consistent with the guidelines of RG 1.105 and the PNPS licensing basis and is, therefore, acceptable.

5.0 REFERENCES

1. Letter from E. T. Boulette, Senior Vice President BECo, to NRC "Proposed Change to Technical Specifications to Remove the Low Condenser Vacuum Scram and Change the Turbine First-Stage Pressure Bypass Parameter" dated October 19, 1993.
2. General Electric Nuclear SIL No. 423 "Erroneous Scram Bypass Setpoint" dated May 31, 1985.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Massachusetts State Official was notified of the proposed issuance of the amendment. The State official had no comments.

7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (58 FR 64603). 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 the amendment.

8.0 CONCLUSION

The Commission has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: F. Paulitz

Date: May 5, 1994