

November 16, 1992

Docket No. 50-293

Mr. Roy A. Anderson
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. Anderson:

SUBJECT: ISSUANCE OF AMENDMENT NO. 143 TO FACILITY OPERATING LICENSE NO. DPR-35, PILGRIM NUCLEAR POWER STATION (TAC NO. M81897)

The Commission has issued the enclosed Amendment No. 143 to Facility Operating License No. DPR-35 for the Pilgrim Nuclear Power Station. This amendment is in response to your application dated October 7, 1991, as supplemented October 26, 1992.

This amendment revises Pilgrim Nuclear Power Station's (PNPS) Technical Specifications by relocating parts of section 3/4.12, "Fire Protection," into Pilgrim's Final Safety Analysis Report (FSAR) and by making related changes to other Technical Specification sections in support of the relocation. These proposed changes were developed in accordance with the guidance contained in NRC Generic Letters (GL) 86-10 and 88-12 and are consistent with NRC and industry efforts to simplify Technical Specifications. The associated change to the FSAR was made in the 1991 update as part of Revision #13. These changes also make a minor administrative correction unrelated to Fire Protection. In addition, by a separate letter also dated October 26, 1992, you have noted a change to page 198 of the Bases section concerning the Emergency Diesel Generator fuel tanks.

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

Sincerely,

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

190059

Enclosures:

- 1. Amendment No. 143 to License No. DPR-35
- 2. Safety Evaluation

cc w/enclosures:

See next page

*See previous concurrence

LA:PDI-3	PM:PDI-3	*OGC	D:PDI-3		
TClark	REaton		WButler		
11/12/92	11/10/92	11/09/92	11/14/92	1/1	1/1

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

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Senior Vice President - Nuclear
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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. 143 to License No. DPR-35
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. R. A. Anderson

Pilgrim Nuclear Power Station

cc:

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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. 143
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 7, 1991 and supplemented October 26, 1992, 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. 143, 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 within 30 days.

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: November 16, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 143

FACILITY OPERATING LICENSE NO. DPR-35

DOCKET NO. 50-293

Replace the following page of the License with the attached page. The revised page contains vertical lines indicating the area of change.

Remove

-3a-

Insert

-3a-

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

ii
198
206
206 a
206 b
206 c
206 c-1
206 d
206 e
206 e-1
206 e-2
206 f
206 f-1
206 f-2
206 g
206 h
206 i
206 i-1
206 j
206 j-1

209
212

Insert

ii
198
206
206 A
206 B

Text moved
to page 206

Text moved
to page 206B
209
212

3.F Fire Protection

Boston Edison shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the SER dated December 21, 1978 as supplemented subject to the following provision:

Boston Edison may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

3.G Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Pilgrim Nuclear Power Station Physical Security Plan," with revisions submitted through September 18, 1987; "Pilgrim Nuclear Power Station Guard Training and Qualification Plan," with revisions submitted through September 24, 1984; and "Pilgrim Nuclear Power Station Safeguards Contingency Plan," with revisions submitted through February 15, 1984. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

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BASES:

3.9

The general objective of this Specification is to assure an adequate source of electrical power to operate the auxiliaries during plant operation, to operate facilities to cool and lubricate the plant during shutdown, and to operate the engineered safeguards following an accident. There are three sources of a-c electrical energy available; namely, the startup transformer, the diesel generators and the shutdown transformer. The d-c supply is required for switchgear and engineered safety feature systems. Specification 3.9.A states the required availability of a-c and d-c power; i.e., an active off-site a-c source, a back-up source of off-site a-c power and the maximum amount of on-site a-c and d-c sources.

The diesel fuel supply consists of two (2) 25,000 gallon tanks. Level instrumentation provides operators the information necessary to ensure a minimum supply of 19,800 gallons in each tank.

Auxiliary power for PNPS is supplied from two sources; either the unit auxiliary transformer or the startup transformer. Both of these transformers are sized to carry 100% of the auxiliary load. If the startup transformer is lost, the unit can continue to operate since the unit auxiliary transformer is in service, the shutdown transformer is available, and both diesel generators are operational.

If the startup and shutdown transformers are both lost, the reactor power level must be reduced to a value whereby the unit could safely reject the load and continue to supply auxiliary electric power to the station.

In the normal mode of operation, the startup transformer is energized, two diesel generators and the shutdown transformer are operable. One diesel generator may be allowed out of service based on the availability of power from the startup transformer, the shutdown transformer and the fact that one diesel generator carries sufficient engineered safeguards equipment to cover all breaks. With the shutdown transformer and one diesel generator out of service, both 345kV supply lines must be available for the startup transformer.

Upon the loss of one on-site and one off-site power source, power would be available from the other immediate off-site power source and the one operable on-site diesel to carry sufficient engineered safeguards equipment to cover all breaks. In addition to these two power sources, removal of the Isolated Phase Bus flexible connectors would allow backfeed of power through the main transformer to the unit auxiliary transformer and provide power to carry the full station auxiliary load. The time required to perform this operation is comparable to the time the reactor could remain on RCIC operation before controlled depressurization need be initiated.

A battery charger is supplied with each of the 125 and 250 volt batteries and, in addition, (1) a 125 volt shared back-up battery charger is supplied which

LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENTS

3.12 Fire Protection

4.12 Fire Protection

Alternate Shutdown Panels

1. Alternate shutdown panels for the following systems shall be OPERABLE:

1. Core Spray
2. RHR
3. RBCCW
4. Salt Service Water
5. HPCI
6. RCIC
7. Automatic Depressurization
8. Diesel Generators

APPLICABILITY:

At all times that the system is required to be OPERABLE.

ACTION:

With any of the alternate shutdown panels inoperable,

- a) Immediately verify that fire detection with automatic fire suppression for the Cable Spreading Room is Operable. If fire detection with automatic fire suppression cannot be determined operable, within one (1) hour from the time the system is determined to be inoperable, establish a continuous Fire Watch with backup fire suppression.
- b) Immediately verify that the fire detector zones listed on Table 3.12 are operable for the respective system fire zone(s) for which the panel(s) provided alternate shutdown capability.

If a fire detection zone cannot be determined operable, establish an hourly fire watch patrol to inspect the affected zone(s).

Alternate Shutdown Panels

The alternate shutdown panels shall be demonstrated to be OPERABLE according to the following:

1. The motor operated valves of the core spray system shall be operated from the alternate shutdown panels once each cycle.
2. The motor operated valves of the RHR system shall be operated once each cycle utilizing the MCC B-17 alternate power source.
3. The pumps of the SSW system shall be operated from the alternate shutdown panels once each cycle.
4. The pumps and motor operated valves of the RBCCW system shall be operated from the alternate shutdown panels once each cycle.
5. Alternate shutdown panel capability for the RCIC and HPCI systems shall be verified to be OPERABLE once each cycle.
6. After each refueling outage and prior to startup, perform a test from the alternate shutdown panel to verify that the relief valve solenoids of the Automatic Depressurization System (ADS) actuate.
7. Once each refueling outage, the diesel generator control circuits shall be isolated from the Cable Spreading Room and the diesel generator started.

**Table 3.12
Fire Detector
Zones Associated with
Alternate Shutdown Panels**

<u>Alternate Shutdown System</u>	<u>Fire Zone</u>	<u>Detection Panel/Det. Zones</u>
Core Spray	1.1 &.2	C-224/4A
RHR	1.1 &.2	C223/3C
RBCCW	1.21 &.22	C-222/2A & 2B
SSW	5.1 & .2 & .3	N/A
HPCI	1.3 & .4	C-223/3D & 3E
RCIC	1.5	C-223/3A & 3B
ADS	1.1 & .2	C-224/4A
DGS	4.1 & .3	C-93/1 & 2

BASES:

3/4.12 Fire Protection

The alternate shutdown system, independent of cabling and equipment in the Cable Spreading Room, is provided to effect safe shutdown of Pilgrim in the event of a fire in the Cable Spreading Room. This is accomplished by installing isolation switches for safety-related equipment that will provide the capability for the plant operators to reach a safe shutdown condition. These switches will isolate their associated equipment from the CSR cables, thus transfer control from the Control Room to the local emergency shutdown stations outside the CSR. These isolation switches are located in alternate shutdown panels and are located as close as practical to the equipment or switchgear they serve.

An emergency shutdown procedure, which is compatible with the design modifications and plant operator availability, provides step-by-step actions to initiate safe shutdown operation. Operator actions to isolate safety-related cables passing through the CSR is initiated as soon as a fire which is not immediately extinguishable is detected and confirmed in the CSR.

Alternate shutdown panels are provided for the following systems:

- a. Core Spray
- b. RHR
- c. RBCCW
- d. Salt Service Water
- e. HPCI
- f. RCIC
- g. Automatic Depressurization System
- h. Diesel Generators

Inoperability of the above listed systems does not require entry into LCO action statements for the alternate shutdown panels.

A surveillance frequency of once per cycle is considered prudent and more frequent testing not warranted. The frequency of once per refueling outage for testing the diesel generators prevents unnecessarily rendering them inoperable during normal power operation. The frequency of once per refueling outage for the Automatic Depressurization System is consistent with the existing surveillance frequency for this system. Requiring this surveillance to be performed during a refueling outage will also assure that plant conditions will allow for safe access to the ADS solenoids.

(The next page is 206K)

6.0 ADMINISTRATIVE CONTROLS

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 Deleted
7. The Chief Operating Engineer, Nuclear Watch Engineers, and Nuclear Operations Supervisors shall hold a Senior Reactor Operator License. The Nuclear Plant Operators shall hold a Reactor Operator License.

6.3 UNIT STAFF QUALIFICATIONS

The qualifications with regard to educational and experience backgrounds of the unit 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 unit staff shall be maintained under the direction of the Nuclear Training Department 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 10CFR Part 55.

6.5.A.6 RESPONSIBILITIES (Continued)

- 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 Nuclear Safety Review and Audit Committee (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 Station Director, the NSRAC Chairman, and the Senior Vice President - Nuclear.
- j. Review of the Station Fire Protection Program and implementing procedures and changes to the Program and implementing 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 Station Director the 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 written notification within 24 hours to the Station Director, the Nuclear Safety Review and Audit Committee, and the Senior Vice President - Nuclear of disagreement between the ORC Members and the ORC Chairman. The Station Director shall have responsibility for resolution of such disagreements.

8. RECORDS

The ORC shall maintain written minutes of each meeting and copies shall be forwarded to the Station Director and the NSRAC Chairman.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 143 TO FACILITY OPERATING LICENSE NO. DPR-35

BOSTON EDISON COMPANY

PILGRIM NUCLEAR POWER STATION

DOCKET NO. 50-293

1.0 INTRODUCTION

This Safety Evaluation (SE) documents an independent review of a Request for License Amendment of the Fire Protection License Condition and Technical Specifications submitted for Pilgrim Nuclear Power Station by Boston Edison, the licensee. The request was submitted to the NRC by letters dated October 7, 1991 and October 26, 1992. The October 26, 1992 submittal made only a page reformatting change and does not change the no significant hazards consideration determination. This SE contains information resulting from a review of the submittal and from a plant visit made on June 23, 1992.

2.0 DISCUSSION

The licensee has requested an amendment to their Operating License which would revise the fire protection license condition and relocate fire protection technical specifications to the Final Safety Analysis Report (FSAR). This amendment was requested in accordance with guidance provided in NRC Generic Letters 86-10 and 88-12.

The proposed changes to the Technical Specifications are as follows:

1. Deleting section 3.12, "Fire Protection System Limiting Conditions for Operation" (LCOs) and 4.12 "Fire Protection System Surveillance Requirements" and relocating the requirements into a fire Protection Program by referencing it in the FSAR.
2. Relocating section 6.2.B.6, dealing with the composition of the Fire Brigade, to the Fire Protection Program.
3. Relocating the part of section 6.4 specifying Fire Brigade training requirements to the Fire Protection Program.
4. Modifying section 6.5.A.6.j to require the Operations Review Committee (ORC) to review the Fire Protection Program.
5. Removing an obsolete reference to Appendix A of 10 CFR Part 55 in section 6.4. The proposed license condition for Pilgrim reads as follows:

Boston Edison shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the SER dated December 21, 1978 as supplemented subject to the following provisions:

Boston Edison may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

3.0 EVALUATION

The license amendment request for Pilgrim was reviewed against guidance provided in NRC Generic Letters 86-10 and 88-12. A site visit was made on June 23, 1992 to review current and proposed plant implementation procedures. In addition, an assessment was made against the guidance in Generic Letter 81-12 which establishes the need to provide technical specification requirements for alternate shutdown equipment which was not previously contained in plant technical specifications.

The licensee incorporated fire protection system surveillance and operability requirements into Revision 13 of the FSAR. Fire Brigade staffing requirements were also included in this revision. Revision 13 was submitted to the NRC on June 28, 1991 in accordance with 10 CFR 50.71(e). The contents of this revision were reviewed during this evaluation to ensure that an equivalent level of protection was maintained. Based on this review, it was determined that Revision 13 to the FSAR contains the same surveillance and operability requirements as currently exist in the plant's technical specifications. It was noted that no reference to the Updated Fire Hazards Analysis (UFHA) was included in this revision. However, the licensee stated that they had identified this oversight and included the appropriate reference in the June 1992 submittal of the FSAR. It was verified that this submittal does contain the appropriate reference.

Based on discussions with the licensee during the June 23rd plant visit, the UFHA at Pilgrim is considered the top level fire protection document. Fire protection programmatic policies and procedures are subtler documents of the UFHA or are cited within the UFHA. It was noted however, that the procedures which will implement requirements of the existing technical specifications are not referenced in the UFHA. The licensee agreed that this was necessary to ensure the fire protection program was fully captured by the references in the FSAR and agreed to reference the appropriate fire protection implementing procedures in the UFHA prior to the license change becoming effective. Draft Procedure No. 8.B.14 "Fire Protection Limiting Conditions For Operation and Compensatory Measure Fire Watch Requirements" was reviewed and found to capture fire protection requirements currently existing in the technical specifications and also now existing in the FSAR.

The proposed license condition was also found to be consistent with the license condition provided in Generic Letter 86-10 and is considered acceptable.

During the plant visit, the licensee was asked if all equipment necessary to achieve alternate shutdown following a fire was included in the technical specifications. The licensee responded that the alternate shutdown panels were included within the technical specifications and operability requirements were consistent with other safe shutdown equipment. After discussion with plant Operations personnel, it was concluded that the plant had met the guidance specified in Generic Letter 81-12 relating to inclusion of new alternate shutdown equipment into technical specifications.

4.0 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.

5.0 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 (56 FR 57691). 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.

6.0 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.

Based on the review of the October 7, 1991 request for changes to the license and fire protection portions of the technical specifications for Pilgrim Nuclear Power Station, it is concluded that Boston Edison has followed guidance provided by the NRC in Generic Letters 86-10 and 88-12 and the amendment should be approved.

Principal Contributor: A. Singh

Date: November 16, 1992