



Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

Mike Bellamy
Site Vice President

March 19, 2003

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop O-P1-17
Washington, DC 20555-0001

SUBJECT: Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DPR-35

**Proposed License Amendment to Eliminate the Requirements
for the Post Accident Sampling System (PASS)
Using the Consolidated Line Item Improvement Process**

- REFERENCES:
1. NEDO-32991-A, Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS)
 2. Technical Specification Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)," dated August 2001
 3. Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Topical Report NEDO-32991, "Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS)," BWR Owners Group Project No. 691

LETTER NUMBER: 2.03.011

Dear Sir or Madam:

In accordance with the provisions of 10 CFR 50.90, Entergy Nuclear Operations, Inc. (ENO) is submitting a request for an amendment to the Technical Specifications (TS) for the Pilgrim Nuclear Power Station (PNPS).

The proposed license amendment would delete TS 5.5.3, "Post Accident Sampling," and thereby eliminate the requirements to have and maintain the post accident sampling system (PASS) at PNPS. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)" dated August 2001. The availability of this TS improvement was announced in the Federal Register on March 20, 2002, as part of the consolidated line item improvement process (CLIP).

ENO requests approval of the proposed license amendment by March 30, 2004, with the amendment being implemented within sixty days following approval.

If you should have any questions regarding this submittal, please contact Mr. Bryan Ford at (508) 830-8403.

A001

I declare under penalty of perjury that the foregoing is true and correct. Executed on the
19 day of March 2003.

Sincerely,

Eric Olson for RMB 3/19/03

R.M. Bellamy

REB/dd

Attachments: 1. Description and Evaluation – 2 pages
2. Proposed Technical Specification Changes (Mark-up) - 1 page
3. Regulatory Commitments – 1 page

cc: Regional Administrator, Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Travis Tate, Project Manager
Project Directorate I-2
Office of Nuclear Reactor Regulation
Mail Stop: O-8B-1A
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Senior Resident Inspector
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

Mr. Robert Walker
Radiation Control Program
Mass. Dept. of Public Health
174 Portland St. 5th Floor
Boston, MA 02114

ATTACHMENT 1

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Description and Evaluation of Proposed Amendment to Technical Specifications

1.0 DESCRIPTION

The proposed License amendment deletes the program requirements of Technical Specification (TS) 5.5.3, "Post Accident Sampling." The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)" dated August 2001. The availability of this TS improvement was announced in the *Federal Register* on March 20, 2002 as part of the consolidated line item improvement process (CLIP).

2.0 EVALUATION

2.1 Applicability of Published Safety Evaluation

Entergy Nuclear Operations, Inc. (ENO) has reviewed the safety evaluation published on December 27, 2001 (66 FR 66949) as part of the CLIP. This verification included a review of the NRC staff's evaluation (as modified slightly by the notice of availability dated March 20, 2002) as well as the supporting information provided to support TSTF-413 (i.e., NEDO-32991, Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS)," submitted November 30, 2000, and the associated NRC safety evaluation dated June 12, 2001). ENO has concluded that the justifications presented in the TSTF and the safety evaluation prepared by the NRC staff are applicable to the Pilgrim Nuclear Power Station (PNPS) and justify this amendment for the incorporation of the changes to the PNPS TS.

2.2 Optional Changes and Variations

ENO is not proposing any variations or deviations from the technical specification changes described in TSTF-413 or the NRC staff's model safety evaluation published on December 27, 2001 (as modified slightly by the notice of availability dated March 20, 2002).

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

ENO has reviewed the proposed no significant hazards consideration determination published on December 27, 2001 (66 FR 66949) as part of the CLIP. ENO has concluded that the proposed determination presented in the notice is applicable to PNPS and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

ATTACHMENT 1

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Description and Evaluation of Proposed Amendment to Technical Specifications

3.2 Verification and Commitments

As discussed in the model SE published in the *Federal Register* on December 27, 2001 (as modified slightly by the notice of availability dated March 20, 2002) for this TS improvement, plant-specific verifications and commitments were performed as follows:

1. ENO is making a regulatory commitment to develop and maintain contingency plans for obtaining and analyzing highly radioactive samples from the Reactor Coolant System, Suppression Pool, and containment atmosphere. The contingency plans will be contained in plant procedures and implementation will be completed within 6 months after the implementation of the License amendment. Establishment and maintenance of contingency plans is considered a regulatory commitment.
2. The capability for classifying fuel damage events at the Alert level threshold will be established and maintained for PNPS at radioactivity levels of 200 microcuries/ml total iodine. This capability will be described in plant procedures and implementation will be completed within 6 months after the implementation of the License amendment. The capability for classifying fuel damage events is considered a regulatory commitment.
3. ENO is making a regulatory commitment to develop and maintain an I-131 site survey detection capability, including an ability to assess radioactive iodines released to offsite environs, by using effluent monitoring systems or portable sampling equipment. The capability for monitoring iodines will be maintained within plant procedures. Implementation of this commitment will be completed within 6 months after the implementation of the License amendment. The capability to monitor radioactive iodines is considered a regulatory commitment.

4.0 ENVIRONMENTAL EVALUATION

ENO has reviewed the environmental evaluation included in the model safety evaluation published on December 27, 2001 (66 FR 66949) as part of the CLIIP. ENO has concluded that the staff's findings presented in that evaluation are applicable to PNPS and the evaluation is hereby incorporated by reference for this application.

ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

5.5 Programs and Manuals

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Core Spray (CS), High Pressure Coolant Injection (HPCI), Residual Heat Removal (RHR), Reactor Core Isolation Cooling (RCIC), Reactor Water Cleanup (RWCU)[Let Down portion], Radwaste Collection System from Reactor Building, sampling system (From Recirc and RWCU), and Standby Gas Treatment (SGTS). The program shall include the following:

- a. Preventive maintenance; and
- b. Periodic visual inspection to identify and estimate leakage.

5.5.3 ~~Post Accident Sampling~~ Not Used

~~This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:~~

- ~~a. Training of personnel;~~
- ~~b. Procedures for sampling and analysis; and~~
- ~~c. Provisions for maintenance of sampling and analysis equipment.~~

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

(continued)

ATTACHMENT 3

SUMMARY OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by ENO in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. Bryan Ford at (508) 830-8403.

Commitment ID Number	Description	RC Item Due Date
RC-03.2011.10	Develop and maintain contingency plans for obtaining and analyzing highly radioactive samples from the Reactor Coolant System, Suppression Pool, and containment atmosphere. The contingency plans will be contained in plant procedures and implementation will be completed within 6 months after the implementation of the License amendment.	9/15/03
RC-03.2011.20	The capability for classifying fuel damage events at the Alert level threshold will be established and maintained for PNPS at radioactivity levels of 200 microcuries/ml total iodine. This capability will be described in plant procedures and implementation will be completed within 6 months after the implementation of the License amendment.	9/15/03
RC-03.2011.30	Develop and maintain an I-131 site survey detection capability, including an ability to assess radioactive iodines released to offsite environs, by using effluent monitoring systems or portable sampling equipment. The capability for monitoring iodines will be maintained within plant procedures. Implementation of this commitment will be completed within 6 months after the implementation of the License amendment.	9/15/03