

BOSTON EDISON COMPANY
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G. CARL ANDOGNINI
SUPERINTENDENT
NUCLEAR OPERATIONS DEPARTMENT

July 3, 1980

BECo. Ltr. #80-127

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

License No. DPR-35
Docket No. 50-293

Ref. (a) NRC Letter (D. G. Eisenhut) to all
Power Reactor Licensees dated April 10,
1980

(b) BECo Letter (G. C. Andognini) to NRC
(D. G. Eisenhut) dated May 27, 1980

Technical Specification Definition of "Operable"

Dear Sir:

Reference (a) requested all utilities to review their existing Technical Specifications regarding the use of the term "Operable" as it applies to the single failure criterion for safety systems and propose changes if required. We informed you via Reference (b) that a review was in process to determine applicability to the Pilgrim Nuclear Power Station Technical Specifications. This letter informs you of the results of that review.

A point by point comparison of our current Technical Specifications to the Reference (a) Models revealed that no inconsistencies exist between the two. Historical interpretations of our Technical Specifications combined with the operating philosophy in practice at Pilgrim Station, assure that no set of equipment outages would be allowed to persist that would result in the facility being in an unprotected condition. However, since our Technical Specifications do not contain an explicit statement addressing the effects of outages on support systems which are relied upon to maintain the "Operability" of a safety related system, we plan to modify our current definition of "Operable" to be consistent with the Model Technical Specification version. Please be advised that the addition of such an explicit statement will not alter or restrict plant operation but will merely formalize a previously unwritten interpretation of the term. We plan to submit this change along with other administrative Technical Specification changes scheduled for submittal during the month of July 1980.

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We trust this letter is responsive to your concerns; however, should you desire additional information, please do not hesitate to contact us.

Very truly yours,

Carl Ardognini