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**BOSTON EDISON COMPANY**  
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September 8, 1980

BECO. Ltr. #80-216

Mr. Boyce H. Grier, Director  
Office of Inspection and Enforcement  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pa. 19406

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

Response to Supplement No. 3 to IE Bulletin 80-17

Dear Sir:

Supplement 3 to IE Bulletin 80-17 dated August 22, 1980 identified the need for interim actions to be implemented until continuous indication of water level in the scram discharge volume is available at Pilgrim Nuclear Power Station. As a result, the bulletin suggested actions were incorporated as follows:

Item 1

For those plants in which the scram discharge volume headers are connected to the instrument volume by a 2 inch pipe, within five days of the date of this Bulletin, provide or verify that procedures are in effect to:

- a. Require an immediate manual scram on low control rod drive air pressure with a minimum 10 psi margin above the opening pressure of the scram outlet valves.
- b. Require an immediate manual scram in the event of:
  - (1) Multiple rod drift-in alarms, or
  - (2) A marked change in the number of control rods with high temperature alarms.

Installation of water level instrumentation in the scram discharge volume with level alarm and continuous level indication in the control room, in response to Item B.1 of IE Bulletin 80-17 Supplement No. 1, may provide a basis for relaxation of the time for initiating a manual scram.

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Response

- a. The pressure at which the scram outlet valves open is 40 PSIG  $\pm$  2 (per a telecon with General Electric representatives). Station procedures now require that a manual scram be initiated at 60 PSI.
- b. (1) Station procedures were revised to require a manual scram in the event of drift of 2 rods in a nine-rod array.
- (2) Surveillance procedures were implemented to provide for a daily check of Control Rod Drive temperature. Additionally, the withdraw header will be monitored for any increase in temperature for all CRD's whose temperature exceeds 250°.

New procedures were implemented requiring manual shutdown if 36 CRD's (25%) indicate leakage into the scram discharge header.

Item 2

In addition, every BWR licensee is requested within five days of the date of this bulletin to provide and implement procedures which require a functional test using water for the instrument volume level alarm, rod block and scram switches after each scram event, before returning to power. This procedure should remain in effect until modifications in addition to Item B.1 of IE Bulletin 80-17 supplement No. 1 are completed to substantially increase reliability of water level indication in the scram discharge volume(s).

Response

Procedures were revised to require operability verification after each scram event of the instrument volume level alarm, rod block and scram switches.

We trust these actions adequately address your concerns. Should you have any questions, please do not hesitate to contact us.

Very truly yours,

Commonwealth of Massachusetts)  
County of Suffolk )

*A. Victor Morisi*

Then personally appeared before me A. Victor Morisi, who, being duly sworn, did state that he is Manager - Nuclear Operations Support Department of Boston Edison Company, the applicant herein, and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My Commission expires: July 6, 1984

*Donald M. Lopez*  
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Notary Public

CC: Director  
Division of Inspection & Enforcement