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September 29, 1980

BECo. Ltr. #80- 243

Mr. Thomas A. Ippolito, Chief Operating Reactors Branch #2 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

Additional Information on Bypass and Reset on Engineered Safety Features

Ref. a) NRC letter (T. M. Novak) to BECo. (G. C. Andognini) dated August 12, 1980

Dear Sir:

The attached information is offered in response to your Ref. a) request for additional information regarding manual override of engineered safety features of the containment isolation valves at Pilgrim Nuclear Power Station. Responses to items 1 & 2 are not included in this letter due to an initial misinterpretation of the actual systems in question; however, via the subsequent telecon clarification provided by the NRC project manager we will provide responses to these items on or before October 15, 1980.

Item 3.

Provide your most recent drawings showing the operation of the CVI and Control Reco Isolation valves during actuation of reset and bypass switches.

See Attached Item 3 drawings. (E-194 Rev. 1, M-227 Rev. 2, E-403 Rev. 5, E401 Rev. 5, SKE-80-3-2 Rev. C, SKE-80-3-1 Rev. A, E-404 Rev. 1, E-244 Rev. 1, E-241 Rev. 5, E-245 Rev. 6)

Item 4.

Provide drawings showing the Containment High Radiation input into the CVI system, or describe alternate input to CVI system in place of Containment High Radiaition signal.

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Response

Containment high radiation is not an input to the Containment Ventilation Isolation system. Based on the latest input from General Electric Company, high drywell pressure and low reactor water level provide diverse independent indications of LOCA conditions which could lead to a release of radioactive material to the primary containment atmosphere. G.E. and the BWR owner's group, however, plan to re-evaluate this position for further verification that existing instrumentation will indeed identify the smallest break that could result in release of radioactive material. This information will be forwarded to you as it becomes available. See attachments for drawings.

Item 5.

Switches RPWA/CS and RPWB/CS shown on drawing E-194 have a "Trip Test" position which appears to provide a bypass function to the CAC system in such a way that any trip occurring after the switches were placed in "Trip Test" could not cause isolation of the CAC system. Provide information on the use of these switches and justification for the bypass function.

Response

The latest issue of drawing E-194 is attached. The escutcheon shown on the original revision of E-194 has been revised. The switch position of concern is now identified as TEST LOGIC. The control switch position (Keylocked) is included to allow test of the isolation logics without requiring valve closure during normal operation. When one control switch is in the TEST LOGIC position, it will prevent automatic closure of one division (inboard or outboard) of the CAC system isolation valves, when a LOCA signal is present. However, the second keylocked (with key removable in STANDBY) control switch will remain in STANDBY and will be available to close the remaining division of containment isolation valves if necessary. In addition to the keylocked feature, the subject control switches will initiate a standby gas treatment system trouble or test alarm when the control switch is moved to the TEST LOGIC position.

Item 6.

Provide three copies of each of the following drawings:

- a. E-118
- b. E-123
- c. Elementary Diagram of Control Room Isolation System
- d. P&I Diagram of Control Room Isolation System

Response

See attached Item 6 Drawings. (3 copies - E-118 Rev. 2, E-242 Rev. 6, E-240 Rev. 10, M-286 Rev. 12, E-123 Rev. 1)

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If during your review of the attached drawings you should have any further questions or concerns, please do not hesitate to contact us.

Very truly yours,

Attachments