

BOSTON EDISON COMPANY  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

J. EDWARD HOWARD  
VICE PRESIDENT  
NUCLEAR

September 1, 1980

BECO. Ltr. #80-211  
Proposed Change #80-3

Mr. Thomas A. Ippolito, Chief  
Operating Reactors Branch #3  
Division of Operating Reactors  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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

Technical Specification Change Concerning  
The Definition of Operable

- Ref. (a) IE Information Notice No. 79-35 dated December  
31, 1979
- (b) NRC letter (D. G. Eisenhower) to All Power  
Reactor Licensees dated April 10, 1980

Dear Sir:

Pursuant to Section 50.90 of the Commission's Rules and Regulations, Boston Edison Company proposes the following modification to Specification 1.0.E, Appendix A of Operating License No. DPR-35. The change consists of replacing our current definition of "Operable" with a definition (Attachment A) that clarifies the use of the term as it applies to the single failure criterion for safety systems.

Reason For Change

Reference (a) cautioned that some licensees may have weaknesses in the administrative control of maintenance and essential equipment at their facilities and requested all power reactor licensees to review their existing procedures and controls to determine if further provisions are required for independent verification of operability of redundant counterpart equipment when an essential component, subsystem, or system is determined inoperable.

Reference (b) reinforced these concerns and requested Licensees to propose Technical Specification changes regarding the use of the term "operable" as it applies to the single failure criterion for safety systems. Model Technical Specifications were included for use as a guidance, and accordingly applicable changes to our Technical Specifications are now proposed.

8009150284

P

Mr. Thomas A. Ippolito, Chief  
September 1, 1980  
Page 2

Safety Considerations

Historical interpretations of our Technical Specifications combined with the operating philosophy in practice at Pilgrim Station have always assured that no set of equipment outages would be allowed to persist which would result in the facility being in an unprotected condition. Therefore, modifying our current definition of "Operable" to the definition presented in Attachment A does not alter or restrict plant operation, but merely formalizes a previously unwritten interpretation of the term.

This change has been reviewed and approved by the Operations Review Committee and reviewed by the Nuclear Safety Review and Audit Committee.

Schedule of Change

This change will be put into effect upon receipt of approval from the Commission.

Fee Determination

In accordance with Section 170.12 of the Commission's Regulations, Boston Edison proposes this license change as an administrative Class II type. Accordingly a check for Twelve Hundred Dollars (\$1,200) is enclosed.

Should you have any questions relative to this change please contact us.

Very truly yours,

*J. Edward Howard*

Attachments

3 signed originals and 37 copies

Commonwealth of Massachusetts)  
County of Suffolk )

Then personally appeared before me J. Edward Howard, who, being duly sworn, did state that he is Vice President - Nuclear 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*

*Dorothy M. Lopes*  
Notary Public