

Docket File

Docket No. 50-293

JUN 26 1981

Mr. A. Victor Morisi, Mgr.
Nuclear Operations Support Dept.
Boston Edison Company
M/C Nuclear
800 Boylston Street
Boston, Massachusetts 02199



Dear Mr. Morisi:

RE: Pilgrim I - Containment Atmosphere Control System

In Boston Edison Company's letter of October 19, 1979 (BECO. 79-207), BECo. referred to their analysis which demonstrated compliance with 10 CFR 50.44. Our letter of October 30, 1979 requested that this analysis be forwarded to us, and that it contain sufficient detail for us to evaluate compliance with 10 CFR 50, GDC 41, 42, and 43.

On May 29, 1981, your staff informed us of a potential non-compliance with 10 CFR 50.44. By June 2, 1981, actions were completed at Pilgrim to guarantee compliance, and immediate safety concerns were resolved. The NRC project manager requested a submittal by BECo. regarding compliance with the regulation, from its implementation to June 2, 1981. Your staff supplied that response on June 15, 1981 (BECO. 81-127). This response was followed by a meeting with us on June 18, 1981. During the meeting it was determined, as documented in BECO. 81-127, that Pilgrim I had not been in compliance with the regulation from the effective date of the rule (11/27/78) to June 2, 1981. This matter of past non-compliance, will be addressed by our Office of Inspection and Enforcement. The Office of Nuclear Reactor Regulation will assure the current compliance of Pilgrim I with 10 CFR 50.44 by performing a review of your present system. This letter formalizes the conclusions of that meeting.

Further information is necessary for us to evaluate the compliance of your system with 10 CFR 50, App. A, GDC 41, 42, and 43. Therefore, in order to determine whether your license should be modified or suspended, you are required pursuant to 10 CFR 50.54(f), to provide to us within seven (7) days of your receipt of this letter, a written statement, signed under oath or affirmation, which confirms the system's current compliance with 10 CFR 50.44 and includes the following:

1. A detailed system description which addresses, in detail, redundancy in components and features, interconnection capabilities, leak detection capability, automatic isolation and containment capability, such that with either a loss of offsite or onsite power, accompanied by the most limiting single failure, the system will perform its safety function.

2. Current (as built) piping and instrumentation drawings and electrical schematics for the system.

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SURNAME (PDR's)
DATE

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3. The pre-operational test data and test procedure(s) used to demonstrate compliance with App. A, GDC 43, and App. B, XI, of 10 CFR 50.

4. A discussion of how the explicit requirements for Design Control (10 CFR 50 App. B, XI) were met. Specifically, a) An independent design review to verify the adequacy of the system design, and b) suitability of parts regarding GDC 4.

5. A discussion of the design control measures which guaranteed an independent design review for field changes to the system, from initial installation to present, per 10 CFR 50, App. B. III, and a similar discussion for future field changes.

6. In order to assure future compliance, your statement should include a commitment to provide Technical Specifications for the system regarding a) surveillance of ducts, piping, filter frames, pressure source levels (ie. required capacity for system operation), or other important components or aspects with the appropriate Limiting Conditions of Operation, and b) periodic pressure and functional testing to demonstrate full compliance with GDC 43. Such testing must reflect the Test Controls of 10 CFR 50, App. B, XI. Records retention must comply with 10 CFR 50, App. B, XVII. The submittal of such proposed Technical Specifications will be acceptable in lieu of the commitment. Our review of your submittal should not preclude your compliance with your proposed specifications unless a conflict exists between them and existing specifications.

Sincerely,

ORIGINAL SIGNED BY

Thomas M. Novak, Assistant Director
for Operating Reactors
Division of Licensing

cc: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

June 26, 1981

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2. Current (as built) piping and instrumentation drawings (P&ID's) and electrical schematics for the system.

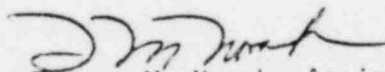
3. The pre-operational test data and test procedure(s) used to demonstrate compliance with App. A, GDC 43, and App. B, XI, of 10 CFR 50.

4. A discussion of how the explicit requirements for Design Control (10 CFR 50 App. B, XI) were met. Specifically, a) An independent design review to verify the adequacy of the system design, and b) suitability of parts regarding GDC 4.

5. A discussion of the design control measures which guaranteed an independent design review for field changes to the system, from initial installation to present, per 10 CFR 50, App. B. III, and a similar discussion for future field changes.

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Sincerely,



Thomas M. Novak, Assistant Director
for Operating Reactors
Division of Licensing

cc: See next page

Mr. A. Victor Morisi
Boston Edison Company

cc:

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