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MANAGER
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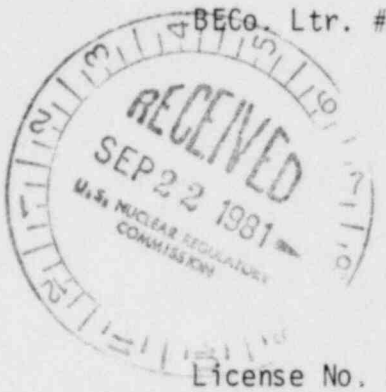
BECo. Ltr. #81-218



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

Clarification to Appendix J Exemption Requests

References (a) Telephone conversation on Appendix J with representatives of BECo/NRC/Franklin Research Center, dated 8-13-81.

(b) NRC letter (T.A.I.) to BECo (A.V.M.) titled, "Compliance with 10 CFR 50 Appendix J," dated April 28, 1981.

In Reference (a), Boston Edison Company presented additional information and clarification in support of previous requests for exemptions to our Appendix J Containment Leak Testing Program. Attachment A provides this information for your further review. Our Technical Specification resubmittal as requested in Reference (b), will be transmitted in the near future and will reflect the information as presented in Attachment A, as well as update the Appendix J Program to current "as built" design at Pilgrim Station.

Should you require further discussion or information on this subject, please contact us at your convenience.

Very truly yours,

AVMorisi

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Attachment

APERTURE Dist:
SEND DRAWINGS to
[redacted] BC

ATTACHMENT A

TIP Penetrations

Since the NRC/FRC SER denying our request for exemption on this subject was based on a misunderstanding of the number of lines involved, clarification was provided as follows:

> PNPS has only 4 lines and each line equals 3/8" diameter.

We believe this information will alleviate your concerns of the potential for leakage of containment because of the number of lines involved. In addition, we will test the TIP Ball Valves in accordance with Appendix J and add these four ball valves to the Technical Specification List of Containment Isolation valves.

Local Leak Rate Testing

Per our discussion we understand the following to be acceptable:

Local Leak Rate Testing will be conducted prior to Integrated Leak Rate Testing and the "as found" Local Leak Rate testing results that cannot be proven and documented as inside containment leakage will be added to the Integrated Leak Rate test results to determine "as is" containment leakage.

CRD Check Valve

Clarification:

The 301-98 valve has been cut out of the line and replaced with a spool piece. The 301-95 valve is the Primary Containment Isolation Valve and is tested in accordance with Appendix J. (See P&ID M-250 Attached)

Standby Liquid Control Check Valve

Clarification:

Exemption from Appendix J testing of the SBLC 1101-15 valve should be allowed because it is installed as part of an engineered safeguard system relied upon to operate (open) during an accident.

We propose that in lieu of testing the 1101-15 valve, the 1106-A and 1106-B (Squib) valves be tested. These valves are explosive-actuated injection valves which provide high assurance of opening when needed and ensure that boron will not leak into the reactor even when the pumps are being tested. Conversely, the design assures that reactor coolant will not leak past these valves into the SBLC System.

The SBLC System is Seismic and Code Class 1 up to and including the squib valves. Our testing to determine leakage past these valves would consist of performing a hydrostatic test on the squib valves while conducting SBLC system operability tests. In addition, the 1101-16 valve is already tested in accordance with Appendix J and both the 1101-16 and the squib valves are physically located close to the containment wall. Print M-249 is attached for your reference.

Reactor Water Cleanup Check Valve

The original Boston Edison Company submittal of January 27, 1976 specified that valve 1201-81 was disqualified as a containment isolation valve because it is not relied upon for containment isolation. "The check valve is installed to limit reverse flow in the event of a postulated break upstream of the check valve until the downstream motor operated containment isolation valves are shut. For this reason it is not considered justified to replace the check valve with an air testable valve".

Clarification to this statement is as follows:

Valve MO-1201-80 is the motor operated isolation valve refered to in the above quotation. Valve 1201-80 receives automatic isolation signals in the event such isolation is required. No operator action would be required to accomplish this isolation. In addition, this piping run is seismically qualified through to the 1201-80 valve and the 1201-80 is tested in accordance with Appendix J.

Print #247, (Co-od B/4) is attached for your reference.

Core Spray Check Valves

The basis for requesting exemption for the 1201-81 valve is also applicable for the core spray 1400 - 9A&B valves as discussed in the January 27, 1976 reference letter. Clarification is provided as follows:

The air operator on the 1400-9A&B valves was not used for active isolation purposes but merely for stroke testing the valve. The air operator has since been disabled and is no longer operable. In lieu of testing the 1400 - 9A&B valves, the MO-1400-24 A&B and the MO-1400-25 A&B valves are tested in accordance with Appendix J and are listed as Primary Containment Isolation Vavles. Since the Core Spray System is an ECCS System it is required to function post accident (valves are open during an accident). For that reason, normal valve lineup for this system is with the MO-1400-25 A&B valves closed during normal operation. Print M-242 is attached for your reference.