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October 29, 1981
BECO. Ltr. #81-255

Mr. Darrell G. Eisenhut, Director
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

STATUS OF BOSTON EDISON EFFORT IN MEETING
THE SCHEDULAR REQUIREMENT OF APPENDIX R TO
10 CFR PART 50.

- References: (a) Boston Edison Company Letter #81-51 dated March 18, 1981
- (b) Boston Edison Company Letter #81-52 dated March 9, 1981
- (c) U.S. NRC Letter to Boston Edison Company dated May 4, 1981
- (d) U.S. NRC Letter to Boston Edison Company dated May 14, 1981
- (e) 10 CFR Section 50.48 and Appendix R

Dear Sir:

On March 9, 1981 Boston Edison Company submitted a request for an exemption from implementation schedule as stated in Sect. 50.48 of Appendix R (Reference (b)). Specifically we had requested that the March 19, 1981 deadline established by 10 CFR 50.48 (C) (5) be extended to October 31, 1981 based on the Task Flow Chart developed for Item III (G) and III (L) of Appendix R. Attachment A to Reference (a) provided a status of our engineering efforts as of March 13, 1981, with a best estimate date for completion. Since that time we have continued with our efforts to meet this schedule, however, a review of all tasks as of October 10, 1981 has shown that we will not be in a position to submit plans and schedules for meeting the provisions of Paragraphs C(2), C(3), C(4), C(5), by October 31, 1981. We therefore request an extension of this date to March 31, 1982.

This additional extension of five months to accomplish the same objectives outlined in our March 9, 1981 letter, is predicated on our ability at present to more clearly define the scope of work necessary for compliance with Appendix R.

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For example, an extensive analysis performed and evaluated during July and August this year has identified all critical cables and equipment, while other project task packages such as Dedicated Shutdown System and generic evaluations for 3 HR and 1 HR barriers were identified as non-feasible and as such abandoned.

Based on this current knowledge we have redefined our task priorities and have projected a more realistic approach for completion. Attachment 2 provides the revised schedule and task breakdown which was originally identified as one of the possible alternatives in our March 9 letter. A large amount of manhours to perform the series of tasks identified in Attachment #1 has already been expended and we project an equal or greater amount of man-hours will be necessary to accomplish the tasks shown in Attachment #2. The current refueling workload and workloads such as the TMI and IE Bulletin #80-11 modifications have placed additional strains on our manpower availability. Accordingly, all jobs must receive thorough review and coordination prior to initiation, in order to obtain an optimum schedule wherein potential common problems and duplication of effort are avoided. An example of one of the complex issues at hand is the redistribution of safety related MCC loads.

In the following paragraphs, the status of our efforts with respect to Sect. III (G) of Appendix R and a reasonable schedule for achieving compliance with those requirements is set forth.

Boston Edison has completed a comprehensive analysis of all safety related circuits and all associated non-safety and safety related circuits of each of Pilgrim's designated fire zones. This analysis has identified critical circuits, equipment and fire zones and has assessed the potential adverse impact the loss of each has on the plant's ability to achieve and maintain shutdown condition in accordance with section III(G) criteria. Site verification by walkdown of these critical circuits and equipment is being performed in conjunction with the current outage. The projected completion date for this effort is November 30, 1981.

With respect to the provisions of alternate shutdown capability as required by section III(G) (3), a number of possible alternate routing paths for a major part of the critical circuits has been identified. A field walk-down of these alternate paths is underway and is expected to be completed by December 10, 1981. This excludes those circuits, which due to inherent plant design configuration, require protection in place. Site verification to evaluate the physical space requirement along with mechanical and structural design constraints such as missile protection, pipe whip, seismic etc.. are considered. Some of the alternate paths include the Torus Compartment and Feedwater Heater Bay in the Turbine Aux. Building. We are also currently performing fire propagation analyses to determine the fire risk involved in critical fire zones such as CRD Module East (Fire Zone 1.9) and CRD Module West (Fire Zone 1.10) located at elevations 23'0" of the Reactor Building. The projected completion date for this effort is December 30, 1981.

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Another of the evaluations being performed involves the evaluation of 3 Hour barriers or 1 Hour barriers with detection and suppression for all critical circuits and equipment. For those circuits that are determined to be in the category of Section III(G) (3), this evaluation will identify the possibility for an alternate solution. Using Appendix R criteria, those circuits and equipment to be safeguarded in place will be identified. The evaluation will also determine the feasibility of implementing each option with respect to each critical fire zone. The projected completion date for this effort is December 31, 1981.

Inasmuch as meeting the intent of Section 50.48(c)(5), we will evaluate all options and initiate actions based on technical and economical feasibility, such as considering the costs to reroute critical cables out of a critical fire zone vs protection in place. Plans and schedules as required by Appendix R will be developed from these evaluations. This effort is expected to be completed by January 20, 1982. Further review with other disciplines (TMI, Equip. Qual, & IEB 80-11) will result with the finalization of the plans and schedules for Fire Protection modifications by March 31, 1982.

In conclusion, we believe that the evaluation process as projected on our schedule (attachment 2) is the most viable approach for determining what modifications and/or exemptions are required, which are both cost effective and in the best interest to the public health and safety.

Should you have any questions or concerns as a result of your review of this letter or it's attachments, please do not hesitate to contact us.

Very truly yours,

John M. Fultz
S. /AVM

Attachments: 1) Task Flow Chart 76560-170
2) Task Flow Chart 76560-171