

BOSTON EDISON

Pilgrim Nuclear Power Station
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Ralph G. Bird

Senior Vice President — Nuclear

BEC0 90- 078

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U.S. Nuclear Regulatory Commission
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License DPR-35
Docket 50-293

Response to Generic Letter 90-04:
Request for Information on the Status of Licensee
Implementation of Generic Safety Issues (GSI) Resolved
with Imposition of Requirements or Corrective Actions

Generic Letter 90-04, dated 4/25/90, requested the implementation status of Generic Safety Issues (GSI) applicable to Pilgrim Nuclear Power Station.

Attached is the information requested in the format designated in enclosure 1 to GL 90-04.

R. G. Bird
for R. G. Bird

Attachment

GGW/jmm/4417

cc: Mr. R. Eaton, Project Manager
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Senior NRC Resident Inspector
Pilgrim Nuclear Power Station

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ATTACHMENT TO BECO LETTER 90- 073

RESPONSE TO GENERIC LETTER 90-04

REQUEST FOR INFORMATION ON THE STATUS OF LICENSEE
IMPLEMENTATION OF GENERIC SAFETY ISSUES (GSI) RESOLVED
WITH IMPOSITION OF REQUIREMENTS OR CORRECTIVE ACTIONS

Facility Name: Pilgrim I

Docket Number: 50-293

Licensee: Boston Edison Co.

Pilgrim Nuclear Power Station

Response to Generic Letter 90-04:

Status of Licensee Implementation of Generic Safety Issues
Resolved with Imposition of Requirements or Corrective Actions

<u>GSI</u> <u>(MPA)</u> <u>Number</u>	<u>Title of GSI</u>	<u>Applicability</u>	<u>Status</u> <u>Reference Documents</u>	<u>Comments</u>
40 (B065)	Safety Concerns Associated with Pipe Breaks in the BWR Scram System	All BWRs	C GL 86-01, dated 1/3/86	Generic analysis performed by NRC concluded that no further action is warranted and the issue is closed.
41 (B058)	BWR Scram Discharge Volume Systems	All BWRs	C NRC letter to BECo, dated 9/6/84, TS amend. 79.	TS amendment 79, dated 9/6/84, approved TS changes for modifications to the PNPS scram discharge system. Two new discharge headers and instrument volumes were installed in response to the NRC confirmatory order, dated 6/24/83.
43 (B107)	Reliability of Air Systems	All Plants	C BECo letter, dated 2/3/89 NRC letter, dated 6/2/89	NRC letter, dated 6/2/89, accepted the BECo response to GL88-14, dated 2/3/89. The BECo response identified completed modifications made to PNPS as a result of studies conducted in response to Generic Letter 88-14.
51 (L913)	Improving the Reliability of Open-Cycle Service Water Systems	All Plants	I GL 89-13 BECo letter, dated 4/2/90	BECo response, dated 4/2/90, informed the NRC that PNPS complies with the majority of the GL 89-13 recommendations. Completion of commitments made in the above response will be scheduled in future Long Term Program (LTP) updates, as allowed in PNPS License Condition 3H.

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67.3.3 (A017)	Improved Accident Monitoring	All Plants	I GL 82-33 RG 1.97 BEC0 letter, dated 2/20/90 TAC 51119	BEC0 response to RG 1.97 is being reviewed by the NRC. Plant modifications are scheduled for completion prior to restart from RFO 9, per BEC0 's LTP update letter, dated 2/20/90. Completion of commitments made in the above response will be scheduled in future Long Term Program (LTP) updates, as allowed in PNPS License Condition 3H.
75 (B076)	Item 1.1-Post-Trip Review (Program Description and Procedure)	All Plants	C NRC letter, dated 9/11/85	NRC SER, dated 9/11/85, concludes that the PNPS post-trip review program and procedures are acceptable.
75 (B085)	Item 1.2- Post-Trip Review- Data and Information Capability	All Plants	C NRC letter, dated 8/13/86	NRC SER, dated 8/13/86, concludes that PNPS data accountability is acceptable. The new PNPS EPIC computer includes the data accountability points referenced in the SER.
75 (B077)	Item 2.1 - Equipment Classification and Vendor Interface (Reactor Trip System Components)	All Plants	C NRC letter, dated 2/15/89 TAC 53702	NRC SER, dated 2/15/89, concludes that the BEC0 response to this item is acceptable.
75 (B086)	Item 2.2.1 - Equipment Classification for Safety-Related Components	AllPlants	C NRC letter, dated 7/18/88 GL 90-03	NRC SER, dated 7/18/88, concludes that Item 2.2. Part 1 is complete for PNPS.

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75 (L003)	Item 2.2.2 - Vendor Interface for Safety-Related Components	All Plants	I NRC letter, dated 5/4/88, GL 90-03, dated 4/3/90, and supp.1	NRC RAI, dated 5/4/88, requested information on vendor interface. BECo intends to provide a response to GL 90-03 by the requested date of 8/31/90. Supplement 1 to GL90-03 provides a revision to the staff position on Item 2.2. Part 2.
75 (B078)	Items 3.1.1 & 3.1.2 - Post-Maintenance Testing (Reactor Trip System Components)	All Plants	C NRC letter, dated 8/12/86	NRC SER, dated 8/12/86, concludes that PNPS post-maintenance test procedures and vendor recommendations are acceptable.
75 (B079)	Item 3.1.3 - Post-Maintenance Testing - Changes to Test Requirements (Reactor Trip System Components)	All Plants	NC NRC letter, dated 4/22/86	BECo letter, dated 6/28/85, informed the NRC that no TS testing requirements relating to this item were identified. NRC SER, dated 4/22/86, concludes that BECo response is acceptable.
75 (B087)	Items 3.2.1 & 3.2.2 - Post-Maintenance Testing (All Other Safety-Related Components)	All Plants	C NRC letter, dated 8/12/86	NRC SER, dated 8/12/86, concludes that BECo is in compliance with this item.
75 (B088)	Item 3.2.3 - Post-Maintenance Testing - Changes to test Requirements (All Other Safety-Related Components)	All Plants	NC NRC letter, dated 4/22/86	BECo letter, dated 6/28/85, responded that no TS testing requirements were identified. NRC SER, dated 8/12/86, concludes that no plant modifications are required.

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75 (B080)	Item 4.1 - Reactor Trip System Reliability (Vendor-Related Modifications)	All PWRs	N A	Not applicable to PNPS. PWRs only
75 (B081)	Items 4.2.1. & 4.2.2 - Reactor Trip System Reliability - Maintenance and Testing (Preventative Maintenance and Surveillance Program for Reactor Trip Breakers)	All PWRs	N A GL 90-04, 4/25/90	Not applicable to PNPS. PWRs only.
75 (B082)	Item 4.3 - Reactor Trip System Reliability - Design Modifications (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants)	All W and B&W Plants	N A GL 90-04, 4/25/90	Not applicable to PNPS. PWRs only.
75 (B090)	Item 4.3 - Reactor Trip System Reliability - Tech. Spec. Changes (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants)	All W and B&W Plants	N A GL 90-04, 4/25/90	Not applicable to PNPS. PWRs only.
75 (B091)	Item 4.4 - Reactor Trip System Reliability - (Improvements in Maintenance and Test Procedures for B&W Plants)	All B&W Plants	N A GL 90-04, 4/25/90	Not applicable to PNPS. PWRs only.
75 (B092)	Item 4.5.1 - Reactor Trip System Reliability - Diverse Trip Features (System Functional Testing)	All Plants	NC NRC letter, dated 8/12/86	NRC SER, dated 8/12/86, concludes that no plant modifications are required.

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75 (B093)	Items 4.5.2 & 4.5.3 - Reactor Trip System Reliability - Test Alternatives and Intervals (System Functional Testing)	All Plants	C & I (see Comments) NRC letter, dated 1/26/89 TAC 54012	NRC SER, dated 1/26/89, closed Item 4.5.2. The SER for Item 4.5.3 has not yet been received by BECo.
86 (B084)	Long Range Plan for Dealing With Stress Corrosion Cracking in BWR Piping	All BWRs	C NRC letter, dated 3/8/88 GL 84-11 GL 88-01 USI A-42	BECo replaced reactor coolant piping because of IGSCC. Augmented inservice inspections continue to be done on piping at PNPS. NRC letter, dated 3/8/88, confirmed acceptance of the BECo response to GL 84-11 regarding augmented inspections of coolant piping. Note: NRC Staff positions in GL 88-01 superceded those in GL 84-11 and are beyond the scope of this GSI.
93 (B098)	Steam Binding of Auxiliary Feedwater Pumps	All PWRs	NA GL 90-04, 4/25/90	Not applicable to PNPS. PWRs only.
99 (L817)	RCS/RHR Suction Line Valve Interlock on PWRs	All PWRs	NA GL 90-04, 4/25/90	Not applicable to PNPS. PWRs only.

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124	Auxiliary Feedwater System Reliability	ANO-1&2, Rancho Seco, Prairie Island 1&2, Crystal River-3, Ft. Calhoun	NA GL90-04, dated 4/25/90	Not applicable to PNPS. Plant specific applicability.
A-13 (B017)	Snubber Operability Assurance - Hydraulic Snubbers	All Plants	C NRC letter, dated 5/15/75, TS amend. 9 NRC letter, dated 9/10/76, TS amend. 20	NRC letter, dated 5/15/75, issued TS amendment 9 for hydraulic snubbers. NRC letter, dated 9/10/76, issued TS amendment 20, modifying requirements for snubber inspections and surveillances.
A-13 (B022)	Snubber Operability Assurance - Mechanical Snubbers	All Plants	C NRC letter, dated 4/12/82 NRC letter, dated 3/11/86	NRC letter, dated 4/2/82, issued TS amendment 60 for hydraulic and mechanical snubbers. NRC letter, dated 3/11/86, issued amendment 93 removing snubber tables from TS (per GL 84-13).
A-16 (D012)	Steam Effects on BWR Core Spray Distribution	Oyster Creek & NMP -1	NA GL90-04, dated 4/25/90	Not applicable to PNPS. BWR 2 only.

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A-35 (B023)	Adequacy of Offsite Power Systems	All Plants	C NRC letter, dated 5/12/80 NRC letter, dated 5/28/82 NRC letter, dated 10/8/82	NRC letter, dated 5/12/80, issued amendment 42. NRC letter, dated 5/28/82, issued amendment 61 for modifications made at PNPS to install voltage relays to provide additional protection against a degraded voltage condition. NRC letter, dated 10/8/82, concurred with a Lawrence Livermore Laboratory (LLL) Technical Evaluation Report (TER) concluding that degraded voltage protection at PNPS is adequate.
B-10	Behaviour of BWR Mark III Containments	All BWR Mark III Plants	NA	Not applicable to PNPS. BWR Mark III plants only.
B-36	Develop, Design, Testing and Maintenance Criteria for Atmosphere Cleanup System Air Filtration and Adsorption Units for Engineered Safety Features Systems and for Normal Ventilation Systems	All Plants with OL Applications after 4/1/80	NA GL90-04, dated 4/25/90	Not applicable to PNPS as PNPS was licensed in 1972. This GSI is applicable to plants licensed subsequent to 4/1/80.
B-63 (B045)	Isolation of Low Pressure Systems Connected to the Reactor Coolant System Pressure Boundary	All Plants	NC NRC letter, dated 8/8/80 GL 80-14	NRC letter, dated 8/8/80, with TER from Franklin Research Center, verified BECo's finding that no piping configurations existed at PNPS that met the concerns of NRC Generic Letter 80-14.

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