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A. V. MORISI
MANAGER
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

July 28, 1982

BECO. Ltr. #82-208

Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch #2
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

Justification for Delaying NUREG-0803
Technical Specification Change

- Reference: a) NUREG-0803 "Generic SER Regarding
Integrity of BWR Scram System
Piping"
- b) BECo Ltr. #82-160, A. V. Morisi to
D. B. Vassallo

Dear Sir:

Reference a) required a change to Pilgrim Nuclear Power Station's Technical Specifications. This change would lower the iodine concentration limit to reduce offsite dose levels, and allow reactor building access during a scram discharge volume rupture. Based on a plant specific analysis, Boston Edison Company (BECO) committed in Reference b) to submit a change which would contain an iodine limit less conservative than that suggested by NUREG-0803. Since that time we have become aware that efforts by the BWR Owners' Group Subcommittee on NUREG-0803 may remove the need for making any change to our Technical Specifications. The results of these efforts are currently being reviewed by the Owners' Group for possible submittal to the NRC as a basis for modifying the requirements of NUREG-0803.

In light of this, BECo believes it prudent not to modify our existing Technical Specifications until the final disposition of the BWR Owners' Group Study has been completed by the NRC.

We trust the above information is responsive to your needs; however, should you require any additional information please do not hesitate to contact us.

Very truly yours,

A. V. Morisi

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