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Mr. A. Victor Morisi
Manager, Nuclear Operations
Support Department
Boston Edison Company
25 Braintree Hill Park
Rockdale Street
Braintree, Massachusetts 02184

Dear Mr. Morisi:

Subject: NUREG-0737 Item II.K.3.15 "Isolation of HPCI and RCIC Modification"

Re: Pilgrim Nuclear Power Station

We have completed our review of your proposed method for implementing the guidance of NUREG-0737 Item II.K.3.15, "Isolation of HPCI and RCIC", as described in your letters dated December 15, 1980 and January 7, 1982. The enclosed Safety Evaluation supports our conclusion that your proposed method is acceptable. Therefore, we consider II.K.3.15 resolved for Pilgrim.

Full implementation of your acceptable method may require a revision to your Technical Specifications (TS). Further guidance on the need for TS revisions and the form of those revisions will be forthcoming.

Sincerely,

Original signed by

Domenic 8. Vassallo, Chief Operating Reactors Branch #2 Division of Licensing

Enclosure: Safety Evaluation

cc w/enclosure: See next page

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Mr. A. Victor Morisi Boston Edison Company

cc:

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Henry Herrmann, Esquire Massachusetts Wildlife Federation 151 Tremont Street Boston, Massachusetts 02111

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Resident Inspector c/o U. S. NRC P. O. Box 867 Plymouth, Massachusetts 02360

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Ronald C. Haynes Regional Administrator, Region I U.S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, PA 19406



# UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

### SAFETY EVALUATION ON PLANT MODIFICATIONS

### IMPLEMENTED IN RESPONSE TO ITEM II.K.3.15 OF NUREG-0737

### "SPURIOUS ISOLATION OF HPCI/RCIC"

## Requirement as Stated in NUREG-0737

The high-pressure coolant injection (HPCI) and reactor core isolation cooling (RCIC) systems use differential pressure sensors on elbow taps in the steam lines to their turbine drives to detect and isolate pipe breaks in the systems. The pipe break detection circuitry has resulted in spurious isolation of the HPCI and RCIC systems due to the pressure spike which accompanies startup of the systems. The pipe-break-detection circuitry should be modified so that pressure spikes resulting from HPCI and RCIC system initiation will not cause inadvertent system isolation.

#### Evaluation of Modifications

The purpose of this item was to eliminate spurious isolations which occur as a result of pressure spikes in the startup transients for HPCI and RCIC systems. The BWR Owners' Group proposed a modification consisting of installing a time delay relay in the isolation logic for HPCI and RCIC. The time delays chosen by the utilities adopting this approach range from three to seven seconds.

Tests of the installed relay at the plants using the time delay relays have shown that a three second delay is sufficient to prevent spurious isolation. Delay times up to thirteen seconds could be allowed without violating the design bases for the HPCI/RCIC isolation systems. This is because the design bases assume that the DC power isolation valve fails and that no offsite AC power is available to the AC valve. The diesel-generator start and emergency bus loading sequence is assumed to require 13 seconds. Therefore, the nominal time delay of three seconds proposed by Boston Edison is acceptable.

Dated: July 28, 1982