Docket No. 50-293

Mr. E. Thomas Boulette, Ph.D Senior Vice President - Nuclear Boston Edison Company Pilgri Uclear Power Station Rocky Hill Road Plymouth, Massachusetts 02360

Dear Mr. Boulette:

SUBJECT: REQUEST FOR ADDITIONAL INFL MATION - SECOND 10-YEAR INTERVAL INSERVICE INSPECTION PLAN AND ASSOCIATED REQUESTS FOR PLLIEF (TAC NO. M85846)

On February 11, 1993, Boston Edison Company submitted an application to amend the Pilgrim Nuclear Power Station inservice inspection plan and associated requests for relief. In order to complete our review of the proposed application, we require further information and clarification as specified in the enclosed request for additional information.

To expedite the review process, a copy of the information requested should be sent directly to Mr. Boyd W. Brown, EG&G Idaho, Inc., INEL Research Center, 2151 North Boulevard, P.O. Box 1625, Idaho Falls, Idaho 83415-2209. If you need clarification on this request, please call me at (301) 504-3041.

The requirements of this letter affect fewer than 10 respondents, and, therefore, are not subject to the Office of Management and Budget review under P.L. 96-511.

Sincerely,

Original signed by: Ronald B. Eaton, Senior Project Manager Project Directorate I-3 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

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### UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001 February 7, 1994

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Ronald B. Eaton, Senior Project Manager Project Directorate I-3 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosure: Request for Additional Information

### Mr. E. Thomas Boulette

Pilgrim Nuclear Power Station

#### CC:

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Office of the Attorney General One Ashburton Place 20th Floor Boston, Massachusetts 02108

Mr. Robert M. Hallisey Director Radiation Control Program Massachusetts Department of Public Health 305 South Street Boston, Massachusetts 02130

Regional Administrator, Region I U. S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, Pennsylvania 19406

Mr. Paul J. Hamilton Licensing Division Manager Boston Edison Company 600 Rocky Hill Road Plymouth, Massachusetts 02360-5599 Mr. H. Vernon Oheim Manager, Reg. Affairs Dept. Pilgrim Nuclear Power Station RFD #1 Rocky Hill Road Plymouth, Massachusetts 02360

Mr. David F. Tarantino Nuclear Information Manager Pilgrim Nuclear Power Station RFD #1, Rocky Hill Road Plymouth, Massachusetts 02360

Mr. Thomas Rapone Secretary of Public Safety Executive Office of Public Safety One Ashburton Place Boston, Massachusetts 02108

Mr. David Rodham, Director Massachusetts Emergency Management Agency 400 Worcester Road P.O. Box 1496 Framingham, Massachusetts 01701-0317 Attn: James Muckerheide

Chairmen, Citizens Urging Responsible Energy P. O. Box 2621 Duxbury, Massachusetts 02331

Citizens at Risk P. O. Box 3803 Plymouth, Massachusetts 02361

W. S. Stowe, Esquire Boston Edison Company 800 Boylston St., 36th Floor Boston, Massachusetts 02199

# REQUEST FOR ADDITIONAL INFORMATION - SECOND 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM

## 1. Scope/Status of Review

Throughout the service life of a water-cooled nuclear power facility. 10 CFR 50.55a(g)(4) requires that components (including supports) that are classified as American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Class 1, Class 2, and Class 3 meet the requirements, except design and access provisions and preservice examination requirements. set forth in ASME Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. This section of the regulations also requires that inservice examinations of components and system pressure tests conducted during the successive 120-month inspection interval comply with the requirements in the latest edition and addenda of the Code incorporated by the reference in 10 CFR 50.55a(b) on the date 12 months prior to the start of a successive 120-month interval, subject to the limitations and modifications listed therein. The components (including supports) may meet requirements set forth in subsequent editions and addenda of the Code that are incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein. The licensee (Boston Edition) has prepared the Pilgrim Nuclear Power Station. Second 10-Year Interval In. rvice Inspection (ISI) Program Plan, to meet the requirements of the 1980 Edition of Section XI through Winter 1980 Addenda. As required by 10 CFR 50.55(g)(5), if the licensee determines that certain Code examination requirements are impractical and requests relief, the licensee shall submit information to the U.S. Nuclear Regulatory Commission (NRC) to support that determination.

The NRC staff has reviewed the available information in the Pilgrim Nuclear Power Station Second 10-Year Interval Inservice Inspection Program Plan, Amendment #92-1, submitted September 28, 1992. Amendment #92-1 includes changes to the ISI program and additional requests for relief from the ASME Code Section XI requirements that the licensee has determined to be impractical.

## 2. Additional Information Required

Based on review of Amendment #92-1 to the Pilgrim Nuclear Power Station Second 10-Year Interval Inservice Inspection Program Plan, the NRC staff has concluded that the following information and/or clarification is required to complete the review of this amendment.

A. Request for Relief PRR-17, Rev. O, III. Alternate Provisions states: "For examinations scheduled during the second ten year interval, an alternate weld has been scheduled as shown on Table PRR-17.1". It is noted that of the 12 examination areas for which relief is requested, only two welds have been selected as alternative examination areas. Based on the review of this request for relief, the staff has determined that the licensee has not provided a) sufficient information relating to the limitations associated with the subject examination areas or b) the basis for the selection of two alternate examination areas for 12 areas for which relief is requested. Please provide the following information to support the staff evaluation: (1) an explanation for the selection of only two alternate examination areas; (2) clarification of the limiting factors contributing to the inaccessibility of the subject examination areas and the percentage of the Code-required examination area that can and will be examined (include drawings, sketches, and examination records as applicable to support the inaccessibility/limitations); (3) the Code classes and item numbers for the welds for which relief is requested; and (4) the basis for concluding that the alternative examinations provide continued reasonable assurance of component and system integrity.

B. Request for Relief PRR-18, Rev. 0, addresses relief from visual examination of component supports H-4-1-6 and H-10-1-13SA due to inaccessibility. Based on the review of this request for relief, the staff has determined that the licensee has not provided sufficient information on the accessibility of the subject examination areas. Please provide the following information to support the staff evaluation: (1) clarification of the factors contributing to the inaccessibility of the subject examination areas and the percentage of the Code-required examination area that can and will be examined (include drawings, sketches, and examination records as applicable to support the inaccessibility/limitations); (2) the Code classes and item numbers for the component supports for which relief is requested; and (3) the basis for concluding that continued reasonable assurance of component and system integrity is provided when no alternative examination is proposed.

C. Request for Relief PRR-19, Rev. O, addresses limitations associated with the examination of longitudinal weld 10R-O-9LD. Please provide the following information to support the staff evaluation: (1) the length of the longitudinal seam that is accessible for examination in conjunction with the circumferential weld (include drawings, sketches, and examination records as applicable to support the inaccessibility/limitations); and (2) the basis for concluding that continued reasonable assurance of component and system integrity is provided by the alternative examination proposed. The schedule for timely completion of this review requires that the Licensee provide, by the requested date, the above requested information and/or clarification with regard to the Pilgrim Nuclear Power Station Second 10-Year Interval Inservice Inspection Program Plan, Amendment #92-1.