Docket No. 50-293

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

Dear Mr. Morisi:

SUBJECT: NUREG-0737 ITEM II.D.1 "RELIEF AND SAFETY VALVE TEST REQUIREMENTS"

Re: Pilorim Nuclear Power Station

We are continuing our review of the BWR Owners Group (BWROG) submittal on the subject item (NEDE-24988-P "Analysis of Generic BWR Safety/Relief Valve Operability Tests Results") and have identified additional areas which need to be addressed in order for the staff to complete its review of NUREG-0737 Item II.D.1. Boston Edison Company previously subscribed to the BMROG's position on this matter.

Enclosure I identifies the staff concerns (which must be addressed on a plantspecific basis) arising from its review of NEDE-24988-P. Please provide your response addressing each of the areas identified in Enclosure 1 on a plantspecific basis within 60 days of the date of this letter.

The reporting and/or recordkeeping requirements contained in this letter are approved under OMB clearance number 3150-0065 which expires 5/31/83.

Sincerely.

ORIGINAL SIGNED BY

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

Enclosure: As Stated

cc w/enclosure See next page

Docket File NRC PDR SNorris KEccleston RWright

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NRC FORM 318 (10-80) NRCM 0240

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USGPO: 1981-335-960

Mr. A. Victor Morisi Boston Edison Company

cc:

Mr. Richard D. Machon
Pilgrim Station Manager
Boston Edison Company
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Plymouth, Massachusetts 02360

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

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

Massachusetts Department of Public Health ATTN: Commissioner of Public Health 600 Washington Street Boston, Massachusetts 02111

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

ENCLOSURE

Request for Additional Information

TMI Action Plan Item II.D.1, Relief and Safety Valve Test Requirements

Prior submittals do not provide the basis for the conclusion that the test results presented in NEDE-24988-P on safety/relief valve testing are applicable to your specific plant. Describe the basis thoroughly, as indicated below.

- 1. The test program utilized a "rams head" discharge pipe configuration. Most plants utilize a "tee" quencher configuration at the end of the discharge line. Describe the discharge pipe configuration used at your plant and compare the anticipated loads on valve internals in the plant configuration to the measured loads in the test program. Discuss the impact of any differences in loads on valve operability.
- The test configuration utilized no spring hangers as pipe supports. Plant specific configurations do use spring hangers in conjunction with snubber and rigid supports. Describe the safety relief valve pipe supports used at your plant and compare the anticipated loads on valve internals for the plant pipe supports to the measured loads in the test program. Describe the impact of any differences in loads on valve operability.
- Report NEDE-24988-P did not report any valve functional deficiencies or anomalies encountered during the test program. Describe the impact of valve safety function of any valve functional deficiencies or anomalies encountered during the program that were not reported.
- 4. The purpose of the test program was to determine valve performance under conditions anticipated to be encountered in the plants. Describe the events and anticipated conditions at the plant for which the valves are required to operate and compare these plant conditions to the conditions in the test program. Describe the plant features assumed in the event evaluations used to scope the test program and compare them to the features at your plant. For example, describe high level trips to prevent water from entering the steam lines under high pressure operating conditions as assumed in the test event and compare them to trips used at your plant.
- 5. The valves are likely to be extensively cycled in a controlled depressurization mode in a plant specific application. Was this mode simulated in the test program? What is the effect of this valve cycling on valve performance and probability of the valve to fail open or to fail close?
- 6. Describe how the values of valve C_V 's in report NEDE-24988-P will be used at your plant. Show that the methodology used in the test program to determine the valve C_V will be consistent with the application at your plant.