# BOSTON EDISON COMPANY BOO BOYLSTON STREET BOSTON, MASSACHUSETTS 02199

J. EDWARD HOWARD

August 30, 1982

BECo. Ltc. #82-231

Proposed Change No. 82-9

Mr. Domenic B. Vassallo, Chief Operating Reactor Branch #2 Division of Operating Reactors Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D. C. 20555

> License No. DPR-35 Docket No. 50-293

## Proposed Change to Technical Specifications

Dear Sir:

#### Introduction

Pursuant to Section 50.90 of the Commission's Rules and Regulations, Boston Edison Company hereby proposes the following modification to Appendix A of Operating License No. DPR-35 as shown on Attachment A.

Your immediate attention to this request would be greatly appreciated.

Very truly yours,

Edward Howard

3 signed originals and 37 copies

Commonwealth of Massachusetts)
County of Suffolk )

Then personally appeared before me J. Edward Howard, who, being duly sworn, did state that he is Vice President - Nuclear Engineering of Boston Edison Company, the applicant herein, and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My Commission expires:

Notary Public

WILLIAM S. STOWE, NOTARY PUBLIC COMMISSION EXPIRES JUNE 30, 1983

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# Proposed Technical Specification Change

### Proposed Change

Reference is made to Pilgrim Nuclear Power Station, Unit #1, Technical Specifications, Section 3.8.A, "Liquid Effluents" and Bases 3.8.A and 4.8.A "Liquid Effluents". Boston Edison wishes to add the following item to Section 3.8.A.4, as shown on Page 178 and 178a attached.

- 4.2 Discharges of radioactive wastes may be made from any point other than the radwaste facility during normal operations on a batch basis if the following conditions are met:
  - a. The minimum dilution water required to satisfy 3.8.A.1 shall be met.
  - b. Two independent samples shall be obtained and analyzed prior to discharge.
  - c. Calculations of effluent flow shall be performed and independently verified.
  - d. Independent verification of applicable valve line ups shall be made.
  - e. All inputs to the batch to be discharged shall be isolated and no other release of radioactive waste discharges shall be allowed at the same time.
  - f. While the discharge is in progress it shall be continuously attended.

Add to Bases 3.8.A & 4.8.A as shown on Page 189 attached:

Reference "3.8.A.4.1 and 3.8.A.4.2" to Specification 3.8.A.4

and

Release of radioactive wastes from any point other than the radwaste facility shall be isolated and no other release of radioactive wastes shall be allowed at the same time.

### Reason for Change

This change is proposed in response to a USNRC request for such. This request was contained in a telephone conversation between the NRC (Division of Resident and Project Inspection) and the PNPS Station Manager on October 23, 1981. The request was reiterated in the NRC letter of October 28, 1981 from Mr. Eldon J. Brunner (NRC) to Mr. A. V. Morisi, Nuclear Operations Support Manager, Boston Edison. The proposed changes are consistent with NUREG-0473, "Radiological Effluent Technical Specification Implementation" as issued on May 7, 1982.

#### Clarification

This proposed change will allow controlled liquid effluent releases from points other than the radwaste facility, such as the neutralizing sump. These releases shall be controlled within the guidelines of 10 CFR Part 20.

By allowing controlled discharges from other locations, the need to physically transport waste through the buildings is eliminated, thereby reducing the opportunity and resultant consequences of human error or equipment failure, as well as reducing personnel exposure.

### Safety Consideration

This change does not present an unreviewed safety question. It has been approved by the Operations Review Committee and reviewed by the Nuclear Safety Review and Audit Committee.

### Schedule of Change

This change will be put into effect upon receipt of approval by the Commission.

#### Fee Determination

Pursuant to 10 CFR 170.12, Boston Edison Company proposes this change as a Class III.