BOSTON EDISON COMPANY BOD BOYLSTON STREET BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON BENIOR VICE PRESIDENT NUCLEAR

> September 30, 1982 BECo. Ltr. #82-263 Proposed Change No. 82-11

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

> > A001

Proposed Technical Specification Change to Section 3.7.D

Dear Sir:

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

Proposed Change

Sections 3.7.D.1 and 3.7.D.2 "Primary Containment Isolation Valves" currently state:

- 3.7.D.1 During reactor power operating conditions, all isolation valves listed in Table 3.7.1 and all instrument line flow check valves shall be operable except as specified in 3.7.D.2.
- 3.7.D.2 In the event any isolation valve specified in Table 3.7.1 becomes inoperable, reactor power operation may continue provided at least one valve in each line having an inoperable valve is in the mode corresponding to the isolated condition.

The desired change consists of clarifying the existing wording to reflect the intent of these Limiting Conditions of Operation. As such, these Sections are required to be revised as follows:

3.7.D.1 Whenever primary containment integrity is required, all isolation valves listed in Table 3.7.1 and all instrument line flow check valves shall be operable except as specified in 3.7.D.2.

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> 3.7.D.2 In the event any isolation valve specified in Table 3.7.1 becomes inoperable, at least one containment isolation valve in each line having an inoperable valve shall be placed in the mode corresponding to the isolated condition.

Reason For Change

The intent of these Technical Specifications is to allow operation in and between all reactor modes when an isolation valve is inoperable, and satisfy the conditions for primary containment integrity when required.

Safety Considerations

A safety evaluation has been performed and has determined that the desired change does not represent an unreviewed safety question as defined in 10 CFR, Part 50.59(c). The bases utilized to reach this conclusion are: 1) the affected lines are in their isolated condition (which is the LCO requirement); 2) system functions which may be affected by operation with valves in their isolated condition are addressed by the individual LCO's.

This change has been reviewed and 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 NRC approval.

Fee Consideration

Boston Edison proposes this as a Class II type change, since it serves only to clarify an existing technical specification. Accordingly, a check for \$1,200 will be forwarded to your office.

Very truly yours,

W) Harrington

Attachments

3 signed originals and 37 copies

Commonwealth of Massachusetts) County of Suffolk

Then personally appeared before me William D. Harrington, who, being duly sworn, did state that he is Sr. Vice President - Nuclear 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 his knowledge and belief.

My Commission expires: 4-14-80

Marien M. Delany