



BOSTON EDISON

Pilgrim Nuclear Power Station
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George W. Davis
Senior Vice President - Nuclear

December 3 1990

BEC0 90-150

U.S. Nuclear Regulatory Commission
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Washington, DC 20555

License DPR-35
Docket 50-293

LETTER OF INTENT REGARDING
CONTAINMENT INTEGRATED LEAK RATE TEST

- References:
- 1) Topical Report, BN-TOP-1 Testing Criteria for Integrated Leakage Rate Testing of Primary Containment Structures for Nuclear Power Plants; Bechtel Corporation, San Francisco, California; Revision 1: November 1, 1972.
 - 2) Telecon J. Kudrick and O. Gormely (NRC) with M. Lenhart (BEC0) dated, November 16, 1987, and Telecon J. Kudrick with M. Lenhart November 29, 1990.

Boston Edison Company (BEC0) is currently planning for Refueling Outage #8 and we are considering the use of Bechtel Corporation's test program outlined in BN-TOP-1 (Reference 1) for the performance of the Containment Integrated Leak Rate Test (ILRT).

Bechtel has concluded in BN-TOP-1 that the intent of 10CFR50 Appendix J is met by this method. This method of testing will save many hours of critical path outage time. BN-TOP-1 testing has been successfully employed by a number of utilities.

BEC0's present ILRT test program meets the intent of Appendix J. To ensure conformance with the BN-TOP-1, we have evaluated the Bechtel test criteria determined that BEC0's test criteria meet or exceed all requirements BN-TOP-1. To aid in your review, we have provided clarification of eight items for which the BEC0 criteria differ from the BN-TOP-1 criteria.

BEC0 understands that subsequent to receipt of this letter, the NRC will review our proposal and issue a Safety Evaluation Report (Reference 2).


G. W. Davis

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Attachment
cc: See next page

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BOSTON EDISON COMPANY

U. S. Regulatory Commission

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Attachment to BECo Letter 90-150
BN-TOP-1 Test Criteria Clarification

<u>BN-TOP-1 Section</u>	<u>Requirement</u>	<u>BECo</u>
2.2 paragraph 2	Data accumulated at least hourly	Approximately every 10 minutes
2.3.B.1	Max. allowable leak rate = La	Max. allowable leak rate = .75 La
4.2	Copper temperature sensors	Platinum temperature sensors
4.2	12 to 24 resistance thermometers	18 resistance thermometers
4.3.a	Aluminum oxide humidity sensors	Lithium chloride humidity sensors
4.3.b	6 dewpoint temperature sensors	10 dewpoint temperature sensors
4.4	1 pressure gage	2 pressure gages
5.1	Bechtel computer program	Stone & Webster computer program