BOSTON EDISON Pilgrim Nuclear Power Station Rocky Hill Road Plymouth, Massachusetts 02360 George W. Davis December 3, 1990 Senior Vice President - Nuclear BECo 90-149 U.S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555 License DPR-35 Docket 50-293 LONG TERM PROGRAM: SEMI-ANNUAL REPORT This letter provides the update to the Long Term Program (LTP) in accordance with Section V.A of the "Plan for the Long Term Program - Pilgrim Nuclear Power Station". Attachment 1 includes schedules for the A and B regulatory items. Attachment 2 includes commitment descriptions, progress since the last update, and summaries of changes Additional activities have been added to reflect the following new regulatory issues: - Generic Letter 89-10, Supplement 3 (MOV Testing) - Generic Letter 89-13 (SSW Heat Exchangers) NRC Bulletin 90-01 (Loss of Fill Oil in Rosemount Transmitters) In addition to Schedule A and B items, we are implementing plant betterment modifications and activities. These additional items, Schedule C, are included in Attachment 3 and are outside the regulatory scope of the Long Term Program and thus exempt from the license conditions imposed on Schedule B items. These additional items are combined with Schedule A and B items to derive integrated schedules for all work activities included in the Long Term Program. In consultation with the NRC Project Manager for Pilgrim Station, we have revised the format from that of past updates. Previously, the commitment descriptions, progress, and change summaries were provided on separate attachments which required a review of each attachment to obtain a complete status profile for every item. The revised format provides the same information in one attachment and should prove easier to use. JDK/njm/4629 Attachments 9012130106 901203 PDR ADOCK 05000293

U.S. Nuclear Regulatory Commission

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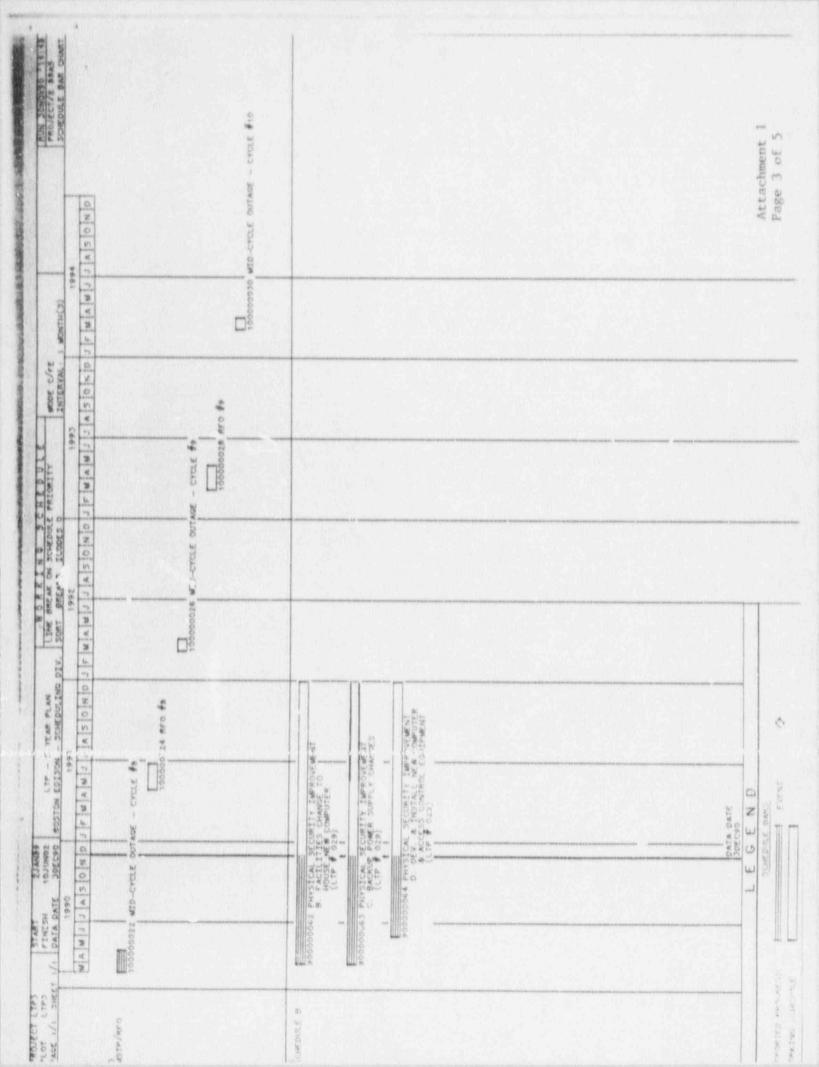
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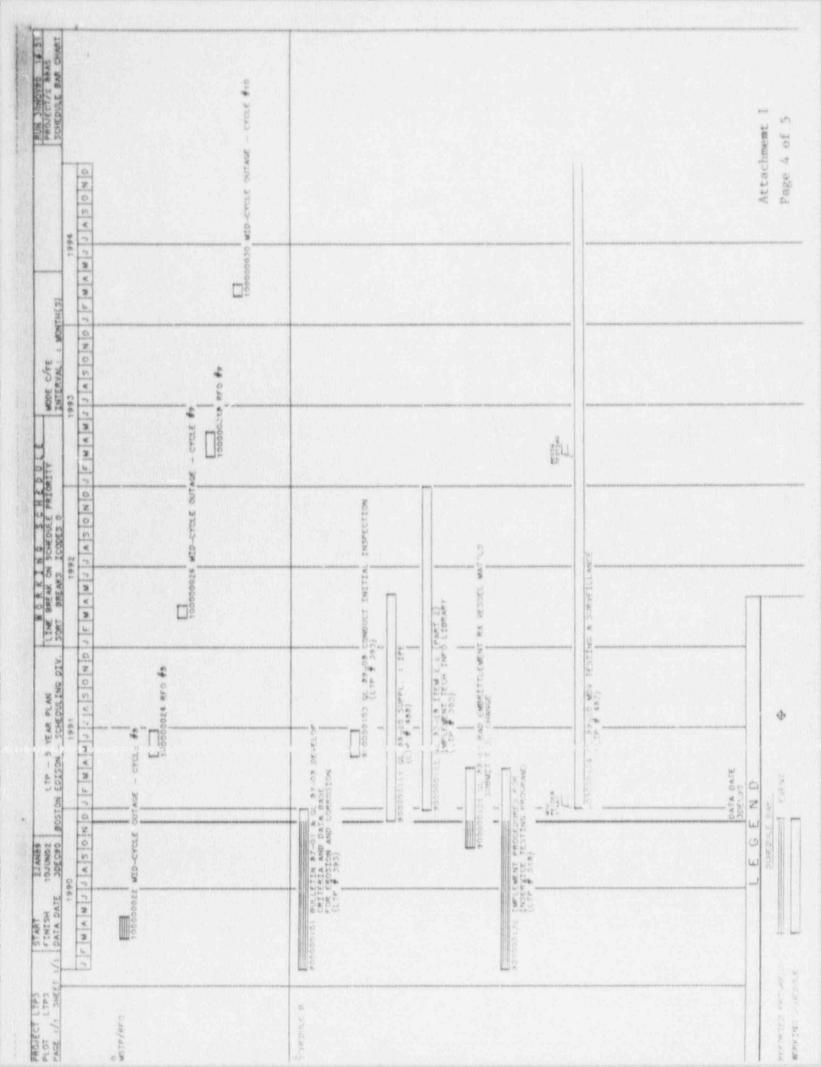
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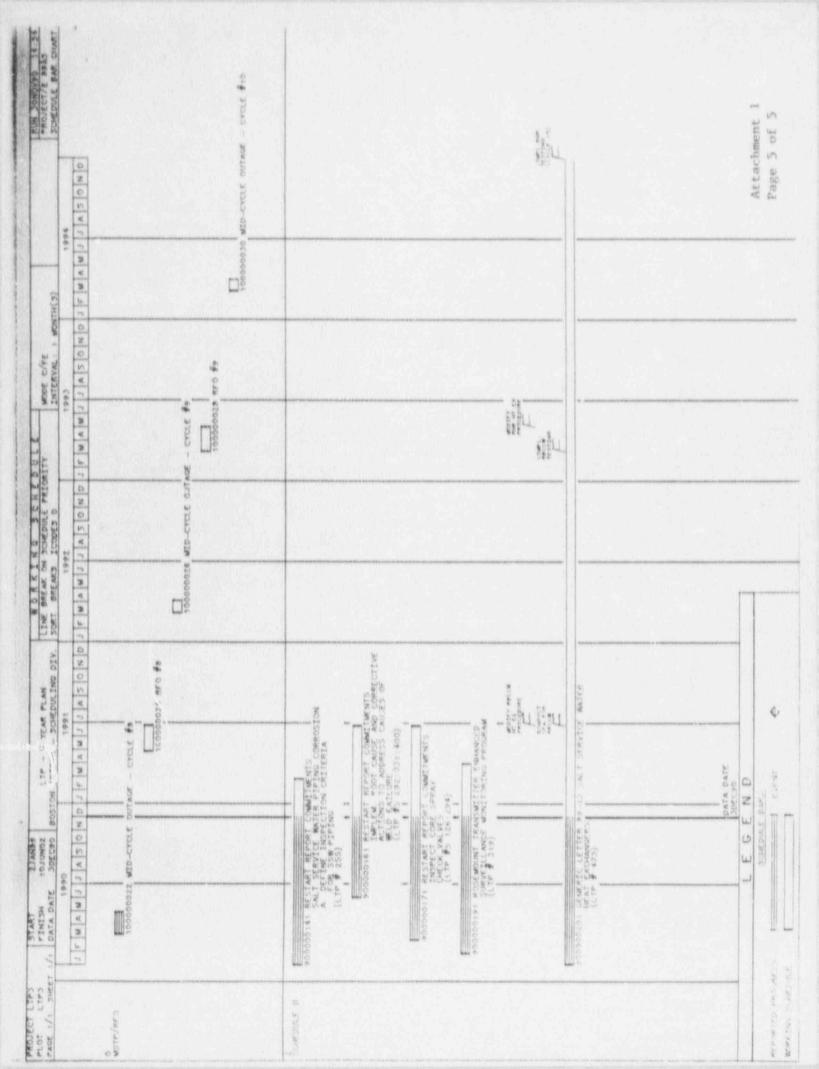
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SCHEDULE A

ATWS RULE COMPLIANCE

Commitment Description

The ATWS Rule 10CFR50.62, requires modifications to the Standby Liquid Control System, Alternate Rod Insertion and Reactor Recirculation Pump Trip by the second refueling outage from June 26, 1984 (i.e., RFO #8 for BECo).

BECo implemented the Standby Liquid Control System modification in RFO #7. The Technical Specification changes for Standby Liquid Control System were approved by the NRC on August 5, 1987 (Amendment #102). The ARI/RPT modifications were implemented in 1980 in response to NUREG-460, as directed by the NRC.

The NRC requested additional information regarding ARI/RPT modifications by Reference 4) to determine compliance with this rule. BECo submitted it's response via Reference 5. The diversity of ARI is yet to be resolved with BWROG, NRC and licensees, as identified in the meeting notes from the NRC (Reference 6). All other items are resolved. The NRC Safety Evaluation Report issued June 6, 1989 (Reference 7) accepted BECo's design except for diversity. Based on the need for additional time to change from the existing Rosemount trip units and relays, the NRC determined an extension of time to fully comply with the diversity requirements would be acceptable. Another alternative discussed in the SER would be to request an exemption from the diversity requirement. The SER states that the NRC staff will provide additional guidance on the diversity issue shortly, and requests BECo provide a schedule for resolution when the additional NRC staff guidance is provided. Concurrently, BECo sought to resolve the diversity issue through the BWR Owner's Group.

In Reference 8, the NRC denied the BWR Owner's Group appeal on diversity.

References

1) 10CFR50.62

2) BECo Ltr. 85-140 dated August 7, 1985

3) NRC Ltr. from Mr. H.R. Denton to BWROG Chairman dated August 19, 1985

4) NRC letter dated September 27, 19875) BECo letter 88-073, dated April 27, 1988

6) NRC letter to BECo, dated January 9, 1989 7) NRC letter to BECo, dated June 6, 1989

8) NRC letter to BWROG Chairman, dated September 20, 1990

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

BECo complies with the rule in all areas except diversity. As stipulated in the NRC SER (Ref. 7)) on this issue, a schedule for resolution of the diversity issue will be developed following receipt of additional NRC guidance, or an exemption request from the diversity requirement will be submitted.

SCHEDULE A

ATWS RULE COMPLIANCE (Continued)

Progress and Summary of Changes - February 1990 to November 1990

Absent the specific NRC guidance, but based on the Reference 8 NRC denial of the BWR Owners Group appeal on diversity, we are presently planning to purchase trip units and relays to address diversity for Pilgrim Station. A separate BECo letter outlining further details and implementation schedules is planned for submittal in the near future.

SCHEDULE A

STATION BLACKOUT RULE (SBO)

Commitment Description

The rule required a submittal by April 17, 1989, providing:

a) a specified station blackout duration with justifications

 a description of procedures for SBO events and recovering from them

 a list of proposed modifications and schedule including procedures for meeting the SBO duration

BECo responded in Reference 2. A schedule for completion of modifications will be determined and submitted within 30 days following receipt of an NRC notification accepting BECo's proposed design. 10CFR 50.63(c)(4) requires the completion within 2 years of notification by NRC that the proposed design is acceptable or provide an explanation and a justification if the schedule will exceed 2 years.

References

1) 10CFR50.63 (53FR23203, dated June 21, 1988)

BECo letter 89-057, dated April 17, 1989

3) NUMARC letter to NUMARC Board of Directors, dated January 4, 1990

4) BECo letter 90-044, dated March 28, 19905) BECo letter 90-106, dated August 31, 1990

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

As part of the Safety Enhancement Program, BECo has installed a 3rd diesel to provide emergency power during station blackout (SBO) periods. In compliance with the rule, a letter was transmitted to NRC on April 17, 1989 committing to designate this 3rd diesel as an Alternate AC Source and to implement a series of modifications to enable the starting and loading of the 3rd diesel from the Control Room within 10 minutes of an SBO. These modifications will be scheduled upon receipt of a NRC SER.

The NRC review of BECo's submittal generated several questions which were discussed in a telephone call on December 20, 1989. Since then, the NRC via NUMARC, has requested all Licensees to re-confirm the level of conformance to the NUMARC SBO guidelines used by the Industry to develop rule compliance.

10CFR50.53(C)(4) requires the submittal of a schedule for completion of SBO modifications within 30 days of NRC notification that our proposed modifications are acceptable. This submittal must include an explanation of the schedule and a justification if the schedule does not provide completion of the modifications within two years of the notification.

SCHEDULE A

STATION BLACKOUT RULE (SBO) (Continued)

In our Apri. 17, 1989 letter providing the details of our proposed modifications, we projected an RFO #8 completion date in anticipation of receiving an NRC acceptance notification shortly after the April 17 submittal. This not being the case, we no longer plan to complete these modifications by RFO #8. A schedule for completion will not be available until the receipt of the NRC notification.

Progress and Summary of Changes - February 1990 to November 1990

In response to the Reference 3 NUMARC request, we submitted information to the NRC (Reference 4) describing modifications we intend to make to qualify the 3rd diesel as an alternate AC source as defined in 10CFR50.2. A prompt NRC review and Safety Evaluation Report was again requested in order that completion of the modification could be accomplished by RFO #8. Other applicable supplemental information in response to the NUMARC request was prepared and submitted to the NRC via Reference 5.

Since the NRC has not yet notified BECo regarding the acceptability of the proposed Reference 4 modifications, we are no longer planning to implement these modifications by RFO #8. A schedule for completion will not be available until receipt of the NRC notification.

SCHEDULE A

DECOMMISSIONING RULE (LTP #480)

Commitment Description

The rule sets forth financial criteria for decommissioning. Each utility must submit a decommissioning funding report by July 27, 1990, containing a certification that financial assurance for decommissioning will be provided by a method acceptable to the NRC and in an amount that may be more (but not less) than the amount stipulated in the rule.

References

- 1) Final Rule, 53FR240418, dated June 27, 1988
- 2) BECo letter 90-092, dated July 26, 1990

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

On Schedule

Progress and Summary of Changes - February 1990 to November 1990

This item is complete. A Decommissioning Funding Report in compliance with 10CFR50.33(k) and 50.75(b) was submitted on July 26, 1990 (Reference 2).

SCHEDULE A

CONTROL ROOM SIMULATOR CERTIFICATION (LTP#s 163, 277, 316, 478)

Commitment Description

locfR55.45 requires the submittal of an application for simulator certification for facility licensees desiring to conduct operator testing. The simulation facility portion of the operator test cannot be administered on other than a certified or an approved simulation facility after May 26, 1991. Since BECo's simulation facility consists solely of a plant-referenced simulator, per locfR55.45(b)(2)(iii) the certification application must be submitted on or before March 26, 1991. The project includes conversion to a dual train computer system.

Reference

1) Final Rule 52FR9460, dated March 25, 1987

2) NRC Generic Letter 90-J8, dated August 10, 1990

Commitment History/Progress

Progress and Summary of Changes - February 1990 to November 1990

Simulator Certification activities are on schedule for submittal of a certification application on or before March 26, 1991.

This date was previously listed as January 27, 1991 and is being changed to March 26, 1991 which is the correct date for final certification application submittal as clarified in Reference 2.

SCHEDULE B

HYDROGEN WATER CHEMISTRY (LTP #298)

Commitment Description

A Hydrogen Water Chemistry system was designed and installed. This system is planned for operation in the third quarter of 1990.

As part of the Hydrogen Water Chemistry Program, a Crack Arrest Verification System (CAVS) was installed.

References

- 1) BECo Letter 84-146, dated September 11, 1984
- 2) NRC Letter 1.84.357, dated December 4, 1984
- 3) BECo Letter 85-022, dated February 1, 1985
- 4) BECo Letter 85-022, dated dated February 15, 1985
- 5) BECo Letter 85-089, dated April 5, 1985
- 6) BECo Letter 86-136, dated September 9, 1986 (T.S. Change)
- 7) NRC Letter, June 17, 1988 (Am. #118 to T.S.)

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

- A. Installation of Extended Test System Complete
- B. Revise Procedures & Train Operators Schedule Revised
- C. Crack Arrest Verification System Schedule Revised
- D. Extended Test System Operable Schedule Revised
- E. Electrolytic Generation of Hydrogen Moved to Additional Items List

The completion of several of the interim milestones associated with implementation of the Hydrogen Water Chemistry (HWC) program were dynamic in nature because they were tied to the availability of resources allocated to the Power Ascension Program (PAP) and the availability of operators to receive HWC training. The March 1989 Long Term Program Report projected the HWC schedules based upon the expected completion of the PAP at that time. Because of the PAP schedule duration, the expected resources to work HWC did not become available within the time frames needed to support the HWC schedule. As a result, the schedules were revised accordingly.

Also, the Electrolytic Hydrogen Generation task was transferred to the <u>Additional Items List</u>, and the remaining HWC program elements were consolidated as one task entitled, <u>Hydrogen Water Chemistry - Operational</u>.

The revised schedule completion date of September 30, 1990 was to allow for the testing and turnover activities to be accomplished prior to declaring the system operational.

SCHEDULE B

HYDROGEN WATER CHEMISTRY (LTP #298) (Continued)

Progress and Summary of Changes - February 1990 to November 1990

The testing and turnover activities commenced April 17, 1990 and were scheduled to be completed by September 30, 1990. During the pre-operational testing, additional hardware and procedural changes were identified that need to be resolved prior to turnover for ope ational use. For example, a new pressure control panel for the tank farm is needed, because the existing control panel cannot control pressure at the precision needed for hydrogen injection. Also, the offgas % O2 sample will need to be modified due to excess moisture buildup in the offgas sample line after approximately 12 hours of operation. Additional system troubleshooting and pre-operational testing is needed before we can determine the extent of system modification required. Accordingly, we are revising our date for Hydrogen Water Chemistry - Operational to March 31, 1991.

SCHEDULE B

CONTROL ROOM DESIGN REVIEW (G.L. 82-33) (LTP #299, 300, 327, 375)

Commitment Description

References 6, 7, and 8 provided a DCRDR Supplementary Summary Report with update information, panel enhancement program information, and a revised DCRDR program plan, respectively. Reference 9 revised the schedule commitments for enhancements to three control panels singled out by BECo for completion ahead of the others.

A final DCRDR Summary Report was submitted on November 30, 1990. Control panel enhancements, previously scheduled for completion by the end of RFO #8, are now scheduled for completion as follows: The on-line portion is planned for completion by June 30, 1992; the outage portion is planned for completion by the end of RFO #9. We are currently planning to install the lighting improvements on-line, before RFO #8. In the event that the lighting work is not completed before RFO #8, the installation will be completed by December 31, 1991.

References

- NUREG 0737: Item I.D.1 1)
- BECo Letter 84-159, dated September 24, 1984 2)
- 3) NRC Letter 85-157, dated May 16, 1985
- 4)
- NRC Letter 86-002, dated January 6, 1986 BECo Letter 87-008, dated January 20, 1987 5)
- BECo Letter 89-064, dated May 2, 1989. 6)
- BECo Letter 89-102, dated July 6, 1989. 7)
- BECo Letter 89-112, dated July 24, 1989.
- BECo Letter 90-008, dated January 11, 1990.

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

Submit Supplementary Summary Report - Complete

Progress and Summary of Changes - February 1990 to November 1990

- The final DCRDR Summary Report was submitted November 30, 1990.
- As a result of ongoing human factors evaluations, the scope of control room panel enhancements has expanded beyond those committed in Ref. 7. The on-line portion is planned to be completed by June 30, 1992; the outage portion is planned for completion by the end of RFO #9. The extent of enhancements to be performed in RFO #8 and those to be performed on a later schedule are detailed in the November 30, 1990 Final DCRDR Summary Report submittal. The next LTP update will reflect the revised scope and schedule of the summary report.

- We have determined that improvements to control room lighting can be implemented on line. Therefore, we are revising the previous completion date of the end of RFO #8, to completion by December 31, 1991. We plan to install the lighting improvements on-line before RFO #8. However, in the event they are not completed before RFO #8, we will complete them by December 31, 1991.

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SCHEDULE B

REGULATORY GUIDE 1.97 (G. L. 82-33) (LTP #301, 305, 326, 377)

Commitment Description

Generic Letter 82-33 required each licensee to review the accident monitoring instrumentation available at their facility and to compare this instrumentation with the recommendations of Regulatory Guide 1.97. The results of BECo's review and comparison for PNPS was provided by Reference 2, with a projected project completion schedule by RFO #8.

A summary of compliance submitted to the NRC in Reference 8 restates compliance information previously submitted, provides new information for specific variables, and identifies open items requiring additional work by BECo. Based on the extent of open items for this project, the project completion schedule was changed to RFO #9. This revised project completion schedule is subject to change based on the NRC's review of both our summary of compliance and the BWR Owner's Group position on neutron flux monitoring capability.

References

- NRC Generic Letter 82-33, dated December 17, 1982
- BECo Letter 84-187, dated November 1, 1984 2)
- 3) NRC Letter 85-372, dated December 12, 1985
- 4) BECo Letter 87-021, dated February 10, 1987
- 5)
- NRC Letter 89-044, dated January 24, 1989 BECo Letter 89-053, dated April 11, 1989 6)
- BECo Letter 90-005, dated January 11, 1990 7)
- BECo Letter 90-010, dated January 15, 1990 8) BECo Letter 90-049, dated April 5, 1990 9)
- BWROG Letter to NRC, BWROG-90107, dated August 20, 1990 10)

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

Schedule revised.

BECo responded to the NRC request for additional information (Reference 5) on April 11, 1989 and supplied the information for instrumentation monitoring effluent radioactivity and status of standby power on January 11, 1990. In addition, a summary of compliance with updated information for specific variables and open items requiring additional work was provided on January 15, 1990. We are presently awaiting NRC disposition of remaining open issues.

Based on the scope of open items identified in our recent summary of compliance submittal, dated January 15, 1990, and the re-allocation of BECo resources to accommodate the prioritization of the other LTP issues, the project completion schedule is revised from RFC #8 to RFO #9. This revised project completion schedule is subject to change based on the NRC's review of both our summary of compliance and the BWR Owners' Group position on neutron flux monitoring capability.

SCHEDULE B

REGULATORY GUIDE 1.97 (G. L. 82-33) (LTP #301, 305, 326, 377) (Continued)

Progress and Summary of Changes - March 1990 to November 1990

In anticipation of the NRC's issuance of a safety evaluation report for Regulatory Guide 1.97 compliance at PNPS, BECo provided an updated summary of compliance to the NRC on April 5, 1990 (Reference 9). This update provided the results of our seismic verification program for Regulatory Guide 1.97 Category 1 for primary containment isolation valve indication or seismic Category 2, equipment at PNPS, and provided new information on certain compliance details and exceptions. The BWR Owners' Group submitted a request to the NRC (Reference 10) to appeal the requirement for a post-accident neutron monitoring system that complies with Regulatory Guide 1.97. The Regulatory Guide 1.97 project scope will accompose the results of the NRC's decision on this appeal. If the appeal is rejected, the addition of work to install a post-accident neutron monitoring system at PNPS will require a revised project completion schedule.

SCHEDULE B

SAFETY PARAMETER DISPLAY SYSTEM (G. L. 82-33) (LTP #018)

Commitment Description

A Safety Parameter Display System to provide a concise display of critical plant operating variables will be implemented at PNPS. The plant computer system was replaced and SPDS has been integrated into the new system. (The computer upgrade is a plant improvement and is not an NKC commitment).

The system was declared operational on April 11, 1990 and meets the requirements of NUREG-0737, Supplement 1.

Also, as discussed in our Reference 10 letter:

- The formal system availability test will not be completed until July 31, 1990.
- We will complete the SPDS human factors validation activities in conjunction with the Detailed Control Room Design Review project. The SPDS related human factors validation activities are expected to be completed by June 30, 1990.

References

- 1) NUREG 0737: Item I.D.2
- 2) NRC Generic Letter 82-33
- 3) BECo Letter 84-133, dated August 10, 1984
- 4) NRC Letter (SER) 85-100, dated March 21, 1985
- 5) BECo Letter 85-107, dated June 13, 1985
- 6) NRC Generic Letter 89-06, dated, April 12, 1989
- 7) BECo Letter 89-097, dated July 10, 1989
- 8) BECo Letter 90-007, dated January 11, 1990
- 9) NRC Letter to BECo, dated April 30, 1990
- 10) BECo Letter 90-066, dated May 1, 1990
- 11) BECo Letter 90-104, dated August 30, 1990

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

Schedule Revised.

The schedule for completion of the SPDS has been revised due to a discovery of a software problem affecting the system operability and availability. This software problem was discovered in mid-December 1989 during testing. The revised completion schedule of April 30, 1990 is needed to allow sufficient time to resolve the software problems. To date, all signals have been connected, 95% of testing is complete, the SPDS operating procedure has been approved, the software has been upgraded to Revision 4 of the Emergency Procedure Guidelines (EPG's), and training of Control Room personnel is complete (except for simulator specific training).

SCHEDULE B

SAFETY PARAMETER DISPLAY SYSTEM (G. L. 82-33) (LTP #018) (Continued)

Progress and Summary of Changes - February 1990 to November 1990

As indicated in our Ref. 10 letter, SPDS was declared operational on April 11, 1990. Human factors validation was completed on June 20, 1990 and system availability testing was completed on July 1, 1990 (Reference 11). We consider this LTP item to be complete.

SCHEDULE B

SEISMIC VERIFICATION PROGRAM (G. L. 87-02)

Commitment Description

As a member of the Seismic Qualification Utility Group (SQUG), BECo plans to implement the seismic verification program at PNPS through the Generic Implementation Procedure (GIP) developed by SQUG. Reference 2 provided an initial series of activities planned to occur during Operating Cycle 8 in 1989 and 1990. These activities were to: develop a safe shutdown equipment list; locate, assemble, and/or recreate original design basis seismic documentation for the above identified equipment; provide training for our walkdown team members; and commence the walkdown in accessible areas. The schedule for completion of these activities was revised via our February 20, 1990 LTP update, to Operating Cycle 9 in 1991 and 1992. However, as stipulated in our Reference 2 submittal, the successful completion of these activities within these time frames depended largely upon the SQUG/NRC disposition of the SER open issues. Since these issues have not been resolved to date, we are rescinding the schedule for completion. The revised schedule for these activities and for final completion of the seismic verification program will be developed further, in concert with the continuing NRC review and resolution of the remaining GIP open issues and submitted in a later LTP update.

References

- 1) NRC Letter 87-078, Generic Letter 87-02, dated February 19, 1987
- 2) BECo Letter 88-145, dated October 11, 1988
- NRC Letter 89-223, dated June 7, 1989

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

- A. Develop safe shutdown equipment list Schedule Revised
- B. Recreate original seismic design basis documentation Schedule Revised
- C. Training and commence walkdown of accessible areas Schedule Revised

The schedule for performing these three items was revised from Cycle 8 to Cycle 9 as a result of our re-assessment of the work to be performed for this seismic issue, with respect to the generic work scope for other similar existing and emerging seismic issues. By incorporating the similarities of work scope for each of the below listed issues into one set of physical activities, we can best optimize our resources. Other seismic issues include:

- Seismic Design Basis (USI A-40)
- Eastern Seismicity and Seismic Design Margins
- External Events (seismic) for Individual Plant Examinations

SCHFOULE B

SEISMIC VERIFICATION PROGRAM (G. L. 87-02) (Continued)

Progress and Summary of Changes - February 1990 to November 1990

A revised schedule for implementation of the seismic verification program will be developed after issuance of the NRC SER resolving the GIP open issues.

SCHEDULE B

PHYSICAL SECURITY IMPROVEMENTS (LTP #029)

Commitment Description

In response to NRC inspection findings, and as a plant betterment activity, BECo committed to replace the security computer and improve certain security activities. This includes miscellaneous perimeter improvements (completed in December 1989), installation of new security computer facilities, a new security computer and access control system, and a backup power supply.

References

- 1) NRC Letter 85-119, dated April 30, 1985 (RER Report)
- 2) I&E Inspection Report 86-08 dated 5/29/86

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

- A. Misc. perimeter improvements Complete
- B. Fac lities change to house new computer On Schedule for completion by December 31, 1990.
- C. Backup power supply changes Schedule revised
- D. Deve op & install new computer & access control equipment On Schedule for completion by December 31, 1991.

The schedule for backup power supply completion was revised from December 1990 to June 1991. This change was made to properly reflect the actual integration of this activity with respect to the remaining security improvement activities.

Progress and Summary of Changes - February 1990 to November 1990

- Facilities change to house new computer Schedule revised from December 31, 1990 to December 31, 1991.
- Backup power supply changes Schedule revised from June 1991 to December 31, 1991.
- Develop & install new computer and access control equipment On schedule for completion by December 31, 1991.
- System cutover of alarms and access control will be in full operation by June 30, 1992.

These changes in schedule are the result of unanticipated delays encountered during construction such as the procurement of materials to relocate existing fire water lines, removal of asbestos during building demolition, and contaminated material handling.

SCHEDULE B

EMERGENCY PREPAREDNESS (LTP #31C)

Commitment Description

Complete Emergency Operations Center renovations, equipment procurement and offsite program upgrade identified in the FEMA Report (Ref. 1). These activities are scheduled for completion by Saptember 30, 1990.

Reference

1) FEMA Report, dated August 5, 1987

Commitment/History Progress

Progress and Summary of Changes - March 1989 to February 1990

- A. Emergency Operations Center Upgrade On Schedule
- B. Equipment Procurement Schedule Revised
- C. Offsite Program Upgrades Schedule Revised

The schedule for completing various equipment procurement and offsite program upgrades was revised from December 1989 to September 1990. The original schedule was based on an expected full-participation exercise in late 1988 or early 1989. Because the exercise was not conducted until October 1989, these items were similarly extended. The renovations to the Emergency Operations Center were completed by the end of 1989.

Progress and Summary of Changes - February 1990 to November 1990

- A. Emergency Operations Center upgrade is complete.
- B. Equipment Procurement is complete.
- C. Offsite Program Upgrades are complete.

The completion of the Equipment Procurement and Offsite Program Upgrades were accomplished in October 1990. We consider this LTP item to be complete.

SCHEDULE B

BULLETIN 87-01, THINNING OF PIPE WALLS & GENERIC LETTER 89-08 EROSION/CORROSION INDUCED PIPE THINNING (LTP #005)

Commitment Description

In response to the Bulletin, BECo (Reference 1) committed to develop criteria for determining how frequently to make thickness measurements and develop a database for determining erosion/corrosion and specific locations and frequencies of future inspections. As a result of the issuance of Generic Letter 89-08 (Reference 2) and BECo's response (Reference 3), we committed to develop a formal procedure for implementation of a long-term erosion/corrosion monitoring program based on the guidelines developed by NUMARC and conduct initial inspections during RFO #8. This procedure was planned to be in place by October 31, 1990 per our Reference 3 response; however, this schedule was changed to December, 31, 1990 via our February 20, 1990 LTP Update.

In the development of the program, we have decided to implement a specification defining the criteria for determining frequency of thickness measurements, the erosion/corrosion data base, and locations and frequencies of inspections. Inspection procedures will be in place before conducting the RFO #8 initial inspections.

In Reference 4, the NRC confirmed the acceptability and schedule of BECo's planned actions to be taken in response to Generic Letter 89-08.

References

- 1) BECo Letter 87-159, dated October 2, 1987
- 2) NRC Generic Letter 89-08, dated May 2, 1989
- 3) BECo Letter 39-107, dated July 21, 1989
- 4) NRC Letter, dated April 30, 1990

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

The bulletin 87-01 scope of work has been revised to incorporate the additional NRC guidance provided in Generic Letter 89-08, "Erosion/Corrosion Induced Pipe Thinning". Our Generic Letter response commitment to develop an erosion/corrosion monitoring procedure by October 31, 1990 was based on the need to complete the procedure development prior to conducting the physical inspections during the next refueling outage. Due to unforeseen emergent issues regarding the Salt Service Water System and the allocation of resources needed to address the issues, the schedule was revised for completion to December 31, 1990. This change does not affect the ability to conduct inspections planned for RFO #8.

Progress and Summary of Changes - February 1990 to November 1990

- A. Develop criteria and data base for long-term erosion/corrosion monitoring is on schedule for completion by December 31, 1990.
- B. Conduct initial inspections is on schedule for RFO #8.

SCHEDULE B

GENERIC LETTER 38-20, SUPPLEMENT 1, INDIVIDUAL PLANT EXAMINATION OF SEVERE ACCIDENT VULNEROR TIES (LTP #488)

Commitment Description

In response to GL 88-20 (Ref. 1) and it's supplement 1 (Ref. 2), BECo provided a program plan for completing an Individual Plant Examination (IPE) for severe accident vulnerabilities for Pilgrim Station (Ref. 3). The schedule for completion was deferred to the February 1990 LTP update.

The NRC confirmed the acceptability of our program plan and requested we identify the milestones and schedule for completing the IPE and submitting the results (Ref. 4).

Our schedule for completing the IPE as proposed in the February 1990 LTP update was October 1, 1991, with the results to be submitted by December 15, 1991. This schedule has been revised to completion and submittal by April 30, 1992. Significant milestones include:

- Initiating Event Data Review
- · Preliminary Event Tree Development
- · Fault Tree Development & Quantification
- · Event Tree Quantification
- · Containment Event Tree Development & Quantification

References

- 1) Generic Letter 88-20, dated November 23, 1988
- 2) Generic Letter 88-20, Supplement #1, dated August 29, 1989
- 3) BECo Letter 89-159, dated October 27, 1989
- 4) NRC Letter 90-006, dated January 10, 1990
- 5) NRC Letter 88-20, Supplement #2, dated April 4, 1990

Commitment History/Progress

Progress and Summary of Changes - February 1990 to November 1990

Our Schedule for IPE is being revised from completion by October 1, 1991 and submittal by December 15, 1991 to completion and submittal by April 30, 1992.

These changes in schedule are being made to accommodate the involvement of additional BECo personnel in the development and quantification of the IPE, which is consistent with the Generic Letter 88-20 guidance.

SCHEDULE B

GENERIC LETTER 83-28, ITEM 2.2 (PART 2) VENDOR INTERFACE (PROGRAMS FOR ALL OTHER SAFETY RELATED COMPONENTS) (LTP #303)

Commitment Description

In response to Reference 1, BECo committed (Ref. 3) to complete an evaluation of existing vendor interface activities and identify recommendations for improvement. This was accomplished as of August 28, 1989. As a result of this evaluation, BEC(is; (1) enhancing formal and informal vendor interface elements and, (2' implementing a new and more comprehensive Plant Equipment Technical Information Library. Our schedule for completion at that time was projected as December 31, 1991.

Generic Letter 90-03 (References 4 & 5) clarified the elements of an equipment manufacturer interface program and requested licensees to review and modify, if necessary, their present equipment manufacturer interface program. Written confirmation of actions taken or planned to be taken was required.

Our Reference 6 response confirmed that the elements of the equipment manufacturer interface program prescribed in Generic Letter 90-03 are included in the existing scope of our Vendor Equipment Technical Information Program (VETIP).

References

- 1) NRC RAI dated May 4, 1988
- 2) NRC SER dated July 18, 1988
- 3) BECo Letter 88-140, dated September 28, 1988
- 4) NRC Generic Letter 90-03, dated March 20, 1990
- 5) RRC Generic Letter 90-03, Supplement 1, dated May 14, 1990
- 6) BECo letter 90-115, dated October 1, 1990

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

The Equipment Technical Information Program is on schedule for completion by December 31, 1991.

Progress and Summary of Changes - February 1990 to November 1990

The Equipment Technical Information Program completion schedule is being revised from December 31, 1991 to December 31, 1992.

This revised schedule is based on our most current review of resource availability and the relative priority of this project to other projects planned during 1991 and 1992.

To date the project has reviewed approximately 120 manuals and catalogued/indexed over 4500 technical bulletins which comprise the current library of approximately 800 manuals (safety related, non-safety related, and Nuclear Steam Supply System). We expect to complete at least the total scope of safety related and Nuclear Steam Supply System manuals (600) over the next two years.

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SCHEDULE B

GENERIC LETTER 88-11, NRC POSITION ON RADIATION EMBRITTLEMENT OF REACTOR VESSEL MATERIALS AND ITS IMPACT ON PLANT OPERATIONS)

Commitment Description

Generic Letter 88-11 stated that Regulatory Guide 1.99, Revision 2, "Radiation Embrittlement of Reactor Vessel Materials," will be used by the NRC in the review of any licensee submittals regarding reactor vessel pressure-temperature limits.

BECo plans to submit a proposed license amendment to extend the current Technical Specification reactor vessel pressure-temperature limits beyond 10 effective full power years. This proposed license amendment will be submitted to the NRC at least four months prior to the end of Cycle 8 and will be developed using the guidelines of Regulatory Guide 1.99, Revision 2.

References

- 1) Generic Letter 88-11, dated July 12, 1988
- 2) BECo Letter 88-165, dated December 2, 1988
- 3) NRC Letter 89-386, dated November 13, 1989.

Commitment History/Progress

Progress and Summary of Changes - February 1990 to November 1990

The Technical Specification change is on schedule for submittal four months prior to the end of Cycle 8.

SCHEDULE B

GENERIC LETTER 89-04, INSERVICE "ESTING PROGRAM (LTP #518)

Commitment Description

In response to Generic Letter 89-04, BECo committed (Ref. 2) to revise and develop a series of pump and valve testing procedures for implementation of an Inservice Testing (IST) Program that conforms to the guidance in the generic letter. The last series of procedure changes/development will be completed by RFO #8-60 days. Reference 3 provided our revised IST Program and Statement of Conformance with the positions stated in the Generic Letter, including relief requests created because of the increased scope of components (Pumps and Valves) being tested. NRC review and approval of these relief requests was requested by May 30, 1990 to allow time for procedure development and testing prior to the end of RFO #8.

The commitment for procedure development was contingent upon NRC approval of the relief request by May 30, 1990. Since these relief requests were not approved by the May 30, 1990 requested date, at BECo's request, a meeting with BECo and the NRC took place on August 6, 1990 to discuss the relief requests. The results of this meeting (Reference 4) concluded that BECo will re-structure the basis for relief on several relief requests, provide additional cross-referencing of material, and re-submit these changes by September 30, 1990. The NRC will then evaluate and disposition the relief requests by Mid-November 1990.

BECo transmitted a revised Inservice Testing Program (Reference 5) which incorporated responses to the NRC review questions and comments. The commitment to complete the procedure changes/development was revised from RFO #8 - 60 days, to March 30, 1991. New procedure changes required by this program revision will be completed within 2 months of BECo receipt of the NRC approval of the program. These commitments were premised on our understanding that the NRC could support a review and issuance of acceptance to BECo by December 1990.

References

- 1) Generic Letter 89-04, dated April 3, 1989
- 2) BECo Letter 89-158, dated October 27, 1989
- 3) BECo Letter 90-001, dated January 4, 1990
- 4) NRC Letter to BECo, dated August 17, 1990
- 5) BECo Letter 90-127, dated October 25, 1990

Commitment History/Progress

Progress and Summary of Changes - February 1990 to November 1990

The schedule for completion of the last series of procedure changes/development is being revised from RFO #8 - 60 days (i.e. February 28, 1991) to March 30, 1991.

The schedule revision is the result of the evolving dynamics associated with the BECo/NRC reviews, discussions, and re-submittals as referenced above.

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SCHEDULE B

P&ID ROOT VALVE (LTP #308)

Commitment Description

In Reference 1, BECo committed to perform walkdowns of plant systems to ensure valves were properly labeled and identified on Piping and Instrumentation Drawings (P&ID) and in the system operating procedures. This review was to include valves in the system's flow path, vent and drain valves on process piping and instrument root valves (an instrument root valve is defined as the first isolation valve from the process piping to an instrument).

In Reference 2, we further committed to upgrade the P&IDs to show design modifications performed during RFO #7 as well as to correct any major process line changes identified during initial walkdowns. At that time we expected the P&ID upgrade project to be complete 180 days after plant restart. Subsequently, the process to carefully control the P&ID upgrade work was developed and determined to require more time than previously estimated.

Reference 3 re-defined the scope of this task and projected a revised completion date of September 1990. Valves considered as part of the Radwaste Betterment Project as well as valves considered inaccessible due to high radiation or requiring substantial staging for access are not included in the scope of this task and will be accomplished concurrent with other tasks involving those valves.

References

- 1) BECo letter 86-091, dated July 3, 1986
- 2) BECo letter 87-206, dated December 23, 1987
- 3) BECo letter 89-126, dated August 23, 1989

Commitment History/Progress

Progress and Summary of Changes - February 1990 to November 1990

This item is complete. The P&ID Root Valve Upgrade was completed by September 1990.

SCHEDULE B

GENERIC LETTER 89-10. SAFETY RELATED MOV TESTING AND SURVEILLANCE (LTP #487)

Commitment Description

Generic Letter 89-10 (Ref. 1) expands the scope of the motor operated valve program required by NRC Bulletin 85-03 and it's Supplement, to include additional testing, inspecting, and maintenance for all safety related motor operated valves.

In response to the Generic Letter, BECo committed (Ref. 2) to develop a program to enhance the maintenance, analysis, and testing already being conducted on MOVs at Pilgrim. Our plan is to begin a design basis review of MOVs in the first quarter of 1991 and to begin testing in RFO #9. We anticipate the testing will require three refueling outages, based on the extent of known scope. Additional scope determinations as a result of NUMARC and BWROG involvement will be factored into our final scope and schedule as appropriate.

Reference 6 requested Licensees to perform a plant a specific safety assessment to determine if generic safety assessments performed by the NRC staff and the BWR Owners' Group are applicable. If MOVs are discovered with potential deficiencies of greater significance than the HPCI, RCIC, and RWCU MOVs, then planned activies to address the generic letter should be re-prioritized accordingly. Notification within 30 days of receipt of Supplement 3 is required, verifying that a plant specific safety assessment has been performed and whether there are MOVs with deficiencies of greater safety significance than in the HPCI, RCIC, and RWCU systems. An additional notification within 120 days of receipt is also requested which provides the criteria reflecting operating experience and the latest test data applied in determining whether deficiencies exist in the HPCI, RCIC, and RWCU MOVs.

References

- Generic Letter 89-10, dated June 28, 1989
- BECo Letter 90-13, dated January 15, 1990 2)
- 3) NRC Letter dated June 7, 1990, Response to Generic Letter 89-10
- NRC Letter dated June 13, 1990, Supplement 1 to Generic Letter 89-10 NRC Letter dated August 3, 1990, Supplement 2 to Generic Letter 89-10 4)
- 5)
- NRC Letter dated October 25, 1990, Supplement 3 to Generic Letter 6) 89-10

Commitment History/Progress

Progress and Summary of Changes - February 1990 to November 1990

- Begin a design basis review of MOVs is on schedule for first quarter of 1991.
- Begin testing is on schedule for RFO #9 (completion within 3 refueling outages).
- 30 day notification in accordance with Generic Letter 89-10, Supplement 3 is planned for submittal by December 13, 1990.
- 120 day notification efforts are planned for submittal by March 13, 1991.

SCHEDULE B

SALT SERVICE WATER PIPING CORROSION (LTP #255)

Commitment Description

A. Define inspection criteria for Salt Service Water piping (RFO #8- 60 days).

B. Identify improved materials for Salt Service Water piping (RFO #8-180 days).

References

4 4 4

1) BECo Letter 88-140, dated September 28, 1988 (Appendix 10 Items #03-124-06 and #03-924-08)

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

A. Define inspection criteria for SSW piping - Schedule Revised
B. Identify improved materials for SSW piping - Schedule Revised

The completion dates for these two items are changed to reflect the correct completion dates for each. The schedule depicted in the March 1989 Long Term Program had these items reversed in order of completion. This change is made to correct the record.

Progress and Summary of Changes - February 1990 to November 1990

A. Define inspection criteria for SSW piping is on schedule for completion by RFO #8 - 60 days.

B. Improved materials for SSW piping have been identified and we are presently planning detailed implementation based on our first choice of material.

SCHEDULE B

IMPLEMENT ROOT CAUSE AND CORRECTIVE ACTIONS TO ADDRESS CAUSES OF WELD FAILURE (LTP #31, 292, 400)

Commitment Description

Provide operator access to RHR Vent Valves, LPECCS Vibration Monitoring, investigate alternatives to throttling globe and gate valves and review methods to establish MOV thrust, replace RHR Discharge Low Pressure Alarm (RFO #8).

Reference

BECO Letter 88-140, dated September 28, 1988 (Appendix 10 Items #01-013-01 & #03-916-06),

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

On Schedule for RFO #8.

Progress and Summary of Changes - February 1990 to November 1990

- Operator access to RHR Vent Valves is on schedule for completion by RFO #8.
- LPECCS Vibration Monitoring is on schedule for completion by RFO #8.
- Investigate alternatives to throttling globe and gate valves and review methods to establish MOV thrust are on schedule for completion by RFO #8.
- Replace RHR Discharge Low Pressure Alarm is on schedule for completion by RFO #8.

SCHEDULE B

REALIGNMENT OF CORE SPRAY CHECK VALVES (LTP #294)

Commitment Description

If necessary, implement the physical change and/or configuration necessary to resolve check valves designed for vertical service or reconfigure existing check valves for horizontal use.

Reference

BECo letter 88-140, dated September 28, 1988 (Appendix 10 Item #03-920-09)

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

On Schedule

Progress and Summary of Changes - February 1990 to November 1990

We have assessed the need to implement check valve physical changes and/or check valve reconfiguration and do not consider either to be necessary. The actions taken during RFO #7 to replace the discs with correct material and install anti-rotation pins have resulted in acceptable core spray system performance during Cycle 8 operation. We intend to re-inspect these valves during RFO #8 using specific inspection criteria.

SCHEDULE B

RHR INJECTION VALVE 29A (LTP #126)

Commitment Description

Evaluate RHR injection gate valve 29A for replacement (RFO #8).

Reference

BECo letter 88-140, dated September 28, 1988 (Appendix 10 Item #03-917-17)

Commitment History/Progress

Progress and Summary of Changes - March 1989 to February 1990

On Schedule

Progress and Summary of Changes - February 1990 to November 1990

This item is complete. We have evaluated the need to replace the RHR injection gate valve 29A and determined no replacement to be necessary. Unlike the 29B valve which experienced leak rates in excess of code allowable, the 29A valve has demonstrated a continued successful testing results history.

SCHEDULE B

NRC BULLETIN 90-01: LOSS OF FILL-OIL IN TRANSMITTERS MANUFACTURED BY ROSEMOUNT INC. (LTP #319)

Commitment Description

The NRC Bulletin identified safety concerns associated with Rosemount transmitters, Model 1153, Series B, Series D and Model 1154, due to failures resulting from fill-bil leakage. The Bulletin required licensees to identify these models utilized in safety-related and ATWS applications and implement specific actions. The actions include replacement of transmitters identified from the suspect lot, development of a basis for continued operation and implementation of an enhanced surveillance program.

As stated in our response to Bulletin 90-01, we identified all Model 1153, Series B, Series D and Model 1154 Rosemount transmitters installed in safety-related and ATWS applications and implemented an Enhanced Surveillance Program for monitoring transmitter performance. The surveillance program will continue until industry resolution is achieved either through NRC or NUMARC. We expect this resolution to occur by the first quarter of 1991.

References

1) NRC Bulletin 90-01, dated March 9, 1990

BECo Letter 90-085, dated July 11, 1990, Response to NRC Bulletin 90-01.

Commitment History/Progress

Progress and Summary of Changes - March 1990 to November 1990

The Rosemount Transmitter Enhanced Surveillance Program is in place and will continue until industry resolution (resolution expected by first quarter of 1991).

SCHEDULE B

GENERIC LETTER 89-13, SALT SERVICE WATER HEAT EXCHANGERS (LTP #473)

Commitment Description

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Generic Letter 89-13 required licensee's to review and evaluate the adequacy of the service water system and all safety related heat exchangers. The review identified a number of enhancements to the PNPS programs and procedures. As a result, BECo committed via Ref. 2 to the following:

- Prior to end of RFO #8, modify the RBCCW heat exchanger test procedures to include an analytical model to calculate RBCCW heat exchanger performance at test and design conditions. Conduct tests with modified procedures during Cycle 9.
- Prior to end of RFO #9, modify the RHR heat exchanger test procedures to include an analytical model to calculate RHR heat exchanger performance at test and design conditions. Conduct tests with modified procedures during Cycle 10.
- Develop a regular maintenance/test program on heat transfer capability of the remaining heat exchangers by RFO #9.
- Conduct a Single Failure Analysis for the RBCCW subsystem by end of RFO #8.
- Prior to end of RFO #8, upgrade the licensed operator training module to include a loss of all service water.

References

- Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment"
- 2) BECo letter 2.90.047, dated April 2, 1990, "Response to Generic Letter 89-13"

Commitment History/Progress

Progress and Summary of Changes - March 1990 to November 1990

The licensed operator training module upgrade is complete.

There are no changes to the other above described commitments and schedules.

ATTACHMENT 3 (Page 1 of 3)

ADDITIONAL ITEMS LIST (SCHEDULE C)*

ITEM	February 1990 Target Schedule	Current Status
Biofouling Control (LTP #322)	Ongoing through RFO #9	No change in schedule
Dredging Study (LTP #496)	Cycle 8	Schedule revised to Cycle 9
Logic System Functional Test Mods (LTP #224)	RFO #8	Schedule revised to RFC #9
Turbine Aux. Roof Restoration (LTP #445)	Cycle 8	No change in schedule
Turbine Bearing Fire Protection (LTP #234)	RFO #8	Schedule revised to ongoing through RFO #9
Make Temporary Modifications Permanent (LTP #444)	Cycle 8	Schedule revised to Cycle 8 and ongoing
Electrolytic Generation of Hydrogen (System Layup) (LTP #298)	Cycle 8	Complete
Analog Trip Drawing Update (LTP #319)	Cycle 8	No change in schedule
LP Air System Upgrade (LTP #035)	Cycle 8	No change in schedule
Replace A & B RBCCW/TBCCW Heat Exchangers (as needed) (LTP #100)	Cycle 8 through RFO #9	C_ncelled
Shutdown Bus Energization Mods (LTP #043)	RFO #8	Schedule revised to RFO #8 & RFO #9
Environmental Monitoring System Additions (LTP #446)	Cycle 8	No change in schedule
Siren Feedback System (LTP #311)	Cycle 8	No change in schedule
Replace Salt Service Water Pipe (as needed) (LTP #255)	RFO #8	No change in schedule
APRM, RBM, and T. S. (ARTS) Improvement Program (LTP #220)	RFO #8	No change in schedule

^{*} Represents a portion of major plant betterments. Total LTP data base contains additional plant betterments, programs/projects and issues.

ATTACHMENT 3 (Page 2 of 3)

ADDITIONAL ITEMS LIST (SCHEDULE C)*

ITEM	February 1990 Target Schedule	Current Status
E203 Panels - Control Panel Wiring (LTP #119)	Cycle 8 & Ongoing	No change in schedule
Priority B Drawing Update (LTP #051)	Cycle 9	No change in schedule
Design Basis Information System (LTP #264)	Cycle 8 & Ongoing	No change in schedule
Design Configuration Control (LTP #367)	Cycle 8 & 9	No Change in schedule
Hanger Drawing Update (LTP #112)	Cycle 8 & 9	No Change in schedule
Sanitary Facility Modification (Septic Waste) (LTP #114)	Cycle 8	No Change in schedule
Radwaste Betterment (LTP #022)	RFO #8 & Ongoing	No Change in schedule
Spent Resin Storage Tank Replacement (LTP #023)	Cycle 8	Revised to Removal in Cycle 8 and Replacement in Cycle 9
Valve Betterment III (LTP #126)	Ongoing through Cycle 9	No Change in schedule
Radiation Source Reduction (LTP #266)	Ongoing through 1994	Schedule extended through 1995
Replace GE Time Delay Relays with Agastat (LTP #414)	RFO #8	Schedule revised to RFO #9
Ventilation Exhaust Fans 104 A/B Replacement (LTP #331)	RFO #8	Schedule Revised to Cycle 9
Instrument/Inspect/Replace Recirc. Pump Shaft (LTP #396)	RFO #8 & 9	Scope change (Instrument only in RFO #8)
Degraded Voltage Study (LTP #015)	Cycle 8 & Ongoing	No Change in schedule
Setpoint Control Program Study (LTP #108)	Cycle 9	No Change in schedule

^{*} Represents a portion of major plant betterments. Total LTP data base contains additional plant betterments, programs/projects and issues.

ATTACHMENT 3 (Page 3 of 3)

ADDITIONAL ITEMS LIST (SCHEDULE C)*

ITEM	February 1990 Target Schedule	Current Status
Obtain Spare DC Motor Control Centers (LTP #336)	Cy-1- 9 through RFO #9	No Change in schedule
Inspect LP Turbine Rotor (LTP #401)	RFO # #	Schedule Revised to RFO#8 (inspect only)
ISI Augmented IGSCC Inspection (LTP #394)	RFO #8	No Change in schedule
Abandon In-Place Program (LTP #278)	Ongc-1 ng	No Change in schedule
	RFO #9	No Change in schedule
Tip System Replacement (LTP #380) Damper Inspection Platforms (LTP #337)	RFO #9	No Change in schedule
Purchase RAD Gate Portal Monitor (LTP #227)	Cycle 8	Complete
R. V. Beltline Weld Inspection (LTP #399)	RFO #8	Schedule revised to RFO #10
Turbine Trucklock Sprinkler (LTP #236)	RFO #9	No Change in schedule
Revise Fire Hazards Analysis (LTP #007)	Cycle 8	Complete
Inspect/Replace Lower Core Support Plate Flow Plugs (GE SIL 359) (LTP #448)	RFO #9	No Change in schedule
Digital Feedwater Control (LTP #253)	RFO #9	No Change in schedule

^{*} Represents a portion of major plant betterments. Total LTP data base contains additional plant betterments. programs/projects and issues.