



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 65 TO FACILITY LICENSE NO. DPR-35

BOSTON EDISON COMPANY

PILGRIM NUCLEAR POWER STATION

DOCKET NO. 50-293

1.0 Introduction

As a result of events involving common cause failures of Scram Discharge Volume (SDV) limit switches and SDV drain valve operability, the NRC staff issued IE Bulletin 80-14 on June 12, 1980. In addition, the staff sent a letter dated July 7, 1980 to all operating BWR licensees requesting that they propose Technical Specification changes to provide surveillance requirements for SDV vent and drain valves and LCO/surveillance requirements on SDV limit switches. Model Technical Specifications were enclosed with this letter to provide guidance to licensees for preparation of the requested submittals. By letter dated August 30, 1982 Boston Edison Company (licensee) requested changes to the Technical Specifications for the Pilgrim Nuclear Power Station.

2.0 Evaluation

The enclosed report (TER-C5506-66) was prepared for us by Franklin Research Center (FRC) as part of a technical assistance contract program. The FRC report provides its technical evaluation of the compliance of the licensee's submittal with NRC provided criteria and identifies all changes to the Technical Specifications proposed by the licensee in its August 30 letter.

The licensee has 1) indicated that our generic safety evaluation report of December 1, 1980 provides justification for not having two operable channels per trip system for control rod withdrawal block instrumentation and 2) cited the fact that a second instrument volume is being installed at Pilgrim as justification for performing functional tests of the SDV level instrumentation at a less frequent interval than specified in the Model TSS.

FRC has concluded that the licensee's response does not meet the explicit requirements of paragraph 3.3-6 and Table 3.3.6-1 of the NRC staff's Model Technical Specifications. However, the FRC report concludes that technical bases are defined on p. 50 of the staff's "Generic Safety Evaluation Report BWR Scram Discharge System", dated December 1, 1980 that permit consideration of this departure from the explicit requirements of the Model Technical Specifications. We conclude that these technical bases justify a deviation from the explicit requirements of the Model Technical Specifications.

In addition, FRC has also concluded that the proposed Pilgrim Technical Specifications do not meet the Model Technical Specification requirements of paragraphs 4.3.1.1 and Table 4.3.1.1-1 for SDV water level high channel functional test requirements. However, the FRC TER concludes that the proposed surveillance requirements for SDV water level high are acceptable, since the licensee is installing a second instrument volume and is providing four reactor protection system level instruments for each of the two instrument volumes, for a total of eight instruments for the RPS. The Model Technical Specifications were developed for plants which have only one instrument volume (four RPS level switches); therefore, the second instrument volume significantly improves the design and reliability of the SDV. Taking this into account, we conclude that the technical bases justify a deviation from the explicit requirements of the Model Technical Specifications.

FRC has concluded that the licensee's proposed Technical Specification revisions meet our criteria without the need for further revision.

### 3.0 Summary

Based upon our review of the contractor's report of its evaluations and discussions with the reviewer, and the licensee, we conclude that 1) the licensee's proposed Technical Specifications satisfy our model Technical Specifications for surveillance of SDV vent and drain valves and for LCOs and surveillance requirements for SDV limit instrumentation or 2) sufficient information has been provided to justify the deviations (i.e. RPS level switch functional test frequency and SDV rod block instrumentation minimum channel operability requirements) from these guidelines. Consequently, we find the licensee's proposed Technical Specifications acceptable.

### 4.0 Environmental Considerations

We have determined that the amendment does not involve a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and pursuant to 10 CFR 51.5(d)(4) that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of the amendment.

5.0 Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of an accident of a type different from any evaluated previously, and does not involve a significant reduction in a margin of safety, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: November 10, 1982

Enclosure: TER

Principal Contributor: K. Eccleston