



**BOSTON EDISON**

Pilgrim Nuclear Power Station  
Rocky Hill Road  
Plymouth, Massachusetts 02360

**George W. Davis**  
Senior Vice President - Nuclear

BECO 91- 012  
February 6 1991

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

License DPR-35  
Docket 50-293

PROPOSED ADMINISTRATIVE TECHNICAL SPECIFICATION  
CHANGE TO SECTION 3/4.7: PRIMARY CONTAINMENT INTEGRITY

Boston Edison proposes the attached changes to Section 3/4.7 "Primary Containment Integrity", of the Pilgrim Nuclear Power Station Technical Specifications in accordance with 10CFR50.90. The proposed change deletes reference to a specific date of 10CFR50 Appendix J and removes Table 3.7-1 "Primary Containment and Reactor Vessel Isolation Valves".

The requested changes are described in Attachment A, the revised Technical Specification pages are in Attachment B, and the current Technical Specification pages, annotated to indicate the requested revisions, are in Attachment C.

*George W. Davis*  
G. W. Davis

MTL/rec/5076

Attachments  
1 Signed Original and 37 Copies

cc: See next page

Commonwealth of Massachusetts)  
County of Plymouth )

Then personally appeared before me, George W. Davis, who being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company 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: April 3, 1992  
DATE

*Marie A. Lenhart*  
NOTARY PUBLIC

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Proposed Change

The proposed changes to the Pilgrim Technical Specifications are administrative in nature and do not change plant design or configuration.

Technical Specification Section 4.7.A.2.a and its associated bases state that primary containment testing is done "in accordance with 10CFR50 Appendix J, as amended thru September 22, 1980." The proposed change deletes "as amended thru September 22, 1980."

This proposed change deletes Table 3.7-1 which contains a partial list of primary containment and reactor vessel isolation valves. The entire list of primary containment isolation valves is contained in the updated Final Safety Analysis Report and plant procedures.

Technical Specification Sections 3.7.A.2.b, and 4.7.A.2.b.2 are modified in this proposed change by deleting the reference to Table 3.7-1.

The words "primary containment" are being added to sections 4.7.A.2.b.1.a and 4.7.A.2.b.1.b for clarity.

Reason for Change

Effective November 15, 1988 (53FR45890), Appendix J to 10CFR50 was modified to permit licensees to use the Mass Point analysis as an alternative to other approved analyses. The Pilgrim Technical Specifications, as written, do not allow use of this change.

We are required to comply with the latest revision to 10CFR50 Appendix J unless an exemption exists. We propose to delete the date of the code leaving the Pilgrim Technical Specifications to state that Primary Containment Leak Tests are performed "in accordance with 10CFR50 Appendix J, with exemptions..."

Deletion of Table 3.7-1 reduces an administrative burden from both the utility and the NRC because future changes to this table would be made in accordance with 10CFR50.59 rather than through a change to Technical Specifications. The operability, surveillance, and test requirements for containment isolation valves are unchanged by this proposed change. The list of isolation valves will be maintained in the Updated Final Safety Analysis Report (Tables 5.2-4 and 7.3-1) and in the plant procedures.

Determination of No Significant Hazards

The proposed amendment deletes a reference to a specific date of 10CFR50 Appendix J, adds words for clarity, and removes the list of "Primary Containment and Reactor Vessel Isolation Valves" from Technical Specifications.

ATTACHMENT A TO BECo LETTER 91-012

The Code of Federal Regulations, 10CFR50.91 requires that at the time a licensee requests an amendment, it must provide to the Commission its analysis, using the standards in 10CFR50.92, about the issue of no significant hazards consideration. Therefore, in accordance with 10CFR50.91 and 10CFR50.92 the following analysis has been performed.

1. The operation of Pilgrim Station in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change deleting the specific date of 10CFR50 Appendix J does not involve a significant increase in the probability or consequences of an accident previously evaluated. This change is administrative in nature. It allows Primary Containment Testing to be performed in accordance with the current revision of 10CFR50 Appendix J. This change does not affect plant operation or design.

The proposed removal of Technical Specification Table 3.7-1 "Primary Containment and Reactor Isolation Valves" does not involve a significant increase in the probability or consequences of an accident previously analyzed. Relocating the table's information to other controlled documents does not affect the probability or consequences of any previously analyzed accident because no hardware changes are being proposed, and because isolation valve operability and surveillance requirements are not relaxed.

2. The operation of Pilgrim Station in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment does not create the possibility of a new or different kind of accident than previously evaluated because the proposed change is administrative in nature and no physical alterations of plant configuration or changes to setpoints or operating parameters are proposed.

3. The operation of Pilgrim Station in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.

The proposed amendment does not involve a significant reduction in a margin of safety because Primary Containment Testing will continue to be conducted in accordance with the latest version of 10CFR50 Appendix J.

Removing Table 3.7-1 from the Technical Specifications does not involve a significant reduction in a margin of safety because operability and surveillance criteria for valves needed for containment integrity are not being relaxed.

ATTACHMENT A TO BECo LETTER 91-012

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 is required prior to startup of Pilgrim Station from Refueling Outage #8. This change will be implemented within 30 days following Boston Edison's receipt of its approval by the Commission.