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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

March 11, 1983
BECo Letter No. 83-70

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

Information on 10CFR50 Appendix R
Items III.G and III.L

Reference: NRC letter dated January 17, 1983

Dear Sir:

The referenced letter concluded that our proposed design for alternate safe shutdown at Pilgrim Station was acceptable except for three areas. Boston Edison Company (BECo) was requested to reconsider its proposed actions in these areas and implement suggested changes accordingly.

Also, BECo was requested to provide written confirmation that all of the post-fire alternative shutdown circuits that share a common bus have coordinated protection.

Our responses are provided as follows:

1) NRC Conclusion

Suppression pool temperature and level indications, independent of the control room, is not provided.

BECo Response

Suppression pool temperature and level indication, independent of a Control Room fire, will be provided at Pilgrim Station as part of the Appendix "R" modification effort, currently scheduled for completion by June 1987.

2) NRC Conclusion

A positive means of isolating the RHR isolation valves to prevent spurious operation of these valves at high pressure during a fire is not provided.

BECo Response

The control circuits for motor operated valve MO-1001-47 will be modified so that the control circuits will not be affected by the same fire condition as its redundant counterpart valve, MO-1001-50.

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Spurious operation of valve MO-1001-60 or MO-1001-63 will be prevented by de-energizing the power to one of these valves, at the motor control center, during normal operation.

3) NRC Conclusion

Switches or similar devices are not provided to obviate the need for pulling fuses to achieve isolation in order to prevent spurious signals during hot shutdown conditions.

BECo Response

We disagree with the need for additional modifications for compliance with Appendix P in this area. The prevention of spurious operation of breakers is procedurally controlled at Pilgrim Station such that power is assured to components required for safe shutdown. The procedures for shutdown from outside the Control Room require the operator to verify breaker status on the safety related 480V. load centers B1 and B2 and then to remove the fuses in the "close" and "trip" breaker circuits to prevent the breakers from changing position due to a fire affecting the control circuit of the breakers.

The operators are trained in the use of the procedures and the hazard exposure during this operation is minimal; additionally the clear identification of the control fuses reduces the possibility of removing the wrong fuse.

Making a modification in this case would only serve to degrade the overall System through the introduction of a potential failure mode.

Protection - Coordination

We have reviewed the fuse to breaker coordination at PNPS and determined that a fuse will not always blow before a breaker trips. As a result we will make modifications as necessary for compliance in accordance with our schedule for final closeout of Appendix R modifications.

Very truly yours,

