

BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

March 11, 1983
BECO Letter No. 83-69

Mr. Darrell G. Eisenhut, Director
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

References: a) BECo Ltr. dated June 25, 1982.
b) Telephone call between BECo and NRC dated December 15, 1982.
c) Telephone call between BECo and NRC dated January 7, 1983.
d) NRC Ltr. dated January 31, 1983.

Dear Sir:

In Reference a), Boston Edison Company (BECO) requested ten exemption requests from the requirements of 10CFR50.48 and Section III.G of Appendix R to 10CFR50. By your letter dated January 31, 1983 (Reference d) you denied each of the requests for exemption.

BECO does not contest the denial of 7 of the 10 exemption requests filed with Reference a). However, we request that you reconsider your denial of exemption requests numbers 7, 8 & 10 that were filed with Reference a). BECO strongly contends that the information which was provided to justify the requests for exemption was neither general in nature nor insufficient for the NRC to render a favorable determination as required by 10CFR50.48(c)(6) for tolling the schedular requirements of 10CFR50.48(c).

BECO's request for schedular exemption (exemption #10) from the requirements of 50.48(c) and requests for exemption (#'s 7 & 8) from the technical requirements of Section III.G of Appendix R to 10CFR50 were denied without allowing us the opportunity to formally clarify our positions. During the Reference b) telecon, BECO was advised that additional information would be required for exemption requests numbers 7 and 8, and would be formally requested by the NRC. The need for additional information concerning exemption request #10 was not discussed. The Reference c) telecon changed this direction and alerted us to the intended wording of the Reference d) letter, which we believe effectively denies us the opportunity to receive exemptions which are necessary and justifiable.

Therefore BECO does not believe that a resubmittal for exemption under the provisions of 10CFR50.12 is warranted, but rather the denial of our initial exemption requests numbers 7, 8 and 10 should be rescinded and the final judgement held in abeyance pending resolution of the additional information issue.

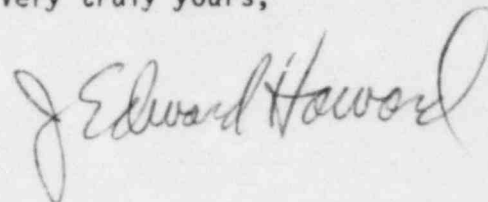
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We are prepared to meet and discuss this issue with you at your earliest convenience and respectfully request your immediate attention in this regard.

Very truly yours,

A handwritten signature in cursive script, reading "J. Edward Howard". The signature is written in dark ink and is positioned to the right of the typed closing "Very truly yours,".