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Boston Edison

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

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BRANCH
May 13, 1994

E. T. Bouletta, PhD
Senior Vice President - Nuclear

BEC0 94-060

Mr. Samuel J. Chilk
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555
Attn: Docketing and Service Branch

Subject: Boston Edison Company Comments on NRC Proposed Rule,
"Codes and Standards for Nuclear Power Plants; Subsection IWE and
Subsection IWL", 59FR 979, dated January 7, 1994.

- References:
1. BWR Owner's Group Comment Letter, BWROG-94036, dated April 22, 1994
 2. Nuclear Energy Institute's Comment Letter dated April 25, 1994

Dear Mr. Chilk:

This letter provides Boston Edison Company's comments on the NRC proposed rule for amending 10 CFR 50.55a to incorporate ASME Code Subsections IWE and IWL (1992 Edition with the 1992 Addenda) for Containment Inspection Criteria.

Boston Edison Company personnel have reviewed the NRC proposed requirements for containment inspection presented in the proposed rule. We have participated with the BWR Owner's Group in developing alternative approaches to achieve the underlying objectives of the NRC's proposed requirements at the time NRC proposed a Generic Letter. The BWROG's comment letter (Reference 1) provides these alternative approaches for containment inspection that were developed through the industry initiatives. We believe, based upon the industry initiatives undertaken through the BWROG, the proposed rule is not required. We hereby endorse BWROG comments provided in Reference 1.

Boston Edison Company is also a participant in the Nuclear Energy Institute's comment letter, and hereby endorses NEI's comments provided in Reference 2.

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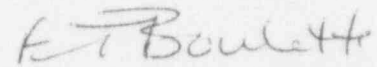
BOSTON EDISON COMPANY

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We believe the existing regulations and licensee commitments are adequate for maintaining containment integrity. Therefore, there is no need for additional rulemaking in the containment inspection area.

Sincerely,



E. T. Boulette, PhD

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