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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

February 4, 1983
BECO Letter No. 83-32

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

Subject: NUREG 0737 Item II.K.3.22 Automatic Switchover of RCIC System

Reference: (A) BECO letter dated December 30, 1982.

(B) BECO letter # 81-44, dated February 27, 1981.

(C) BECO letter # 81-10, dated January 22, 1981.

(D) BECO letter # 80-318, dated December 31, 1980.

Dear Sir:

Item II.k.3.22 stated "The reactor core isolation cooling (RCIC) system takes suction from the condensate storage tank with manual switchover to the suppression pool when the condensate storage tank is low. This switchover should be made automatically." Boston Edison provided in Ref. (D) our initial response to this item. Based on our review of operating procedures, we fulfilled via Ref. (C) our commitment to provide procedures for manual switchover of the RCIC system from the condensate storage tank to the suppression pool.

Additionally, we provided via Ref (B) the basis for our decision not to incorporate the automatic switchover feature which stated "Boston Edison has evaluated TAP Item II.K.3.22 Automatic Switchover of RCIC suction, and we believe it to be unnecessary. During events that require significant amounts of high pressure coolant injection, the 4250 gpm HPCI system is relied upon to provide the required coolant makeup. RCIC is not relied upon during this circumstance due to its relatively low flow capacity. Failure to operate HPCI would result in operation of the ADS and LPCI system. Therefore, RCIC is not needed during events requiring large amounts of high-pressure coolant injection. During events requiring the RCIC system to operate, the large volume of water available to the RCIC suction in conjunction with the low flow of RCIC gives the operator considerable time to check condensate storage tank level and perform manual switchover of RCIC suction from the control room, as per existing station procedures. Therefore, BECO feels the addition of an auto switchover of RCIC is unnecessary and existing procedures are fully adequate."

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We believe an adequate response to NUREG 0737 item 11.K.3.22 has been made. This letter, again provides the appropriate justification for non-compliance as requested in Ref. (A). Additionally, our decision is consistent with the mandates of 10 CFR 50.109, and we believe it is responsive to your needs. However, should you have any comments or questions concerning this response, please do not hesitate to contact us.

Very truly yours,

WJ Harrington