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WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
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March 29, 1983  
BECO Letter No. 83-81

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: Information in Response for NUREG 0737 Item III.D.3.4 Control Room  
Habitability

Reference: (A) BECO Letter to NRC 81-37 dated February 11, 1981  
(B) BECO Letter to NRC 82-149 dated May 25, 1982  
(C) NRC Letter to A.V. Morisi dated June 24, 1982

Dear Sir:

Reference A provided Boston Edison's initial response on the subject NUREG item. Reference B provided additional information as requested by members of your staff. Subsequently, the NRC concurred with Boston Edison's position on the subject NUREG Item and issued a Safety Evaluation Report (SER), Reference C.

The purpose of this letter is to inform you of changes to our original position and the bases for those changes.

Background

In early 1978, Boston Edison personnel met with NRC staff to evaluate fire protection requirements and resolve specific areas of concern. The staff's concern was the potential for a toxic environment, produced by fire, enveloping the Control Room and that an operator would be required to remain in the Control Room because there was no alternate shutdown location outside the Control Room at that time. Additionally, the operator would also be changing air bottles in a toxic environment. As a result of the NRC concerns, Boston Edison installed the Breathing Air Manifold System in the Control Room.

Subsequently, NUREG 0737 was issued which prescribed very similar requirements for Control Room Habitability under TAP Item III.D.3.4. Our initial response Reference A took credit for this Breathing Air Manifold System under Section 2 entitled Control Room Characteristics. Our statements for breathing air apparatus were made in the context of a postulated toxic chemical release and the subsequent need for breathing air apparatus.

Once an alternate shutdown system was installed at Pilgrim Station during RFO #5, the need for the reservoir to be located in the Control Room was dependent only upon our commitment made in response to NUREG 0737 Item III.D.3.4.

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Since the initial response of Reference A, Reference B provided the results of our toxic chemical survey in the vicinity of Pilgrim Station. Based on the study's conclusion, there is no evidence of toxic chemicals stored or transported near the vicinity of Pilgrim Station. Therefore, the need for breathing air for control room operators under toxic chemical release became moot. Consequently, we have removed the breathing air reservoir from the Control Room.

We continue to maintain, at a minimum, 5 one hour air supply cylinders of self-contained breathing apparatus (SCBA's) in the Control Room and approximately 55 hours of stored air capacity on-site which we believe is consistent with our original commitment of Reference A.

We recognize the need to provide you with updates or changes to our previous responses when safety evaluation reports have been written and issued by your staff. Therefore, should you require additional information or clarification on this subject, please do not hesitate to contact us.

Very truly yours,

*W D Harrington*