



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 10, 1995

Senior Vice President - Nuclear  
Boston Edison Company  
Pilgrim Nuclear Power Station  
Rocky Hill Road  
Plymouth, MA 02360

SUBJECT: GENERIC LETTER 89-19, "REQUEST FOR ACTION RELATED TO RESOLUTION OF UNRESOLVED SAFETY ISSUE A-47, 'SAFETY IMPLICATION OF CONTROL SYSTEMS IN LWR NUCLEAR POWER PLANTS' PURSUANT TO 10 CFR 50.54(f)" (TAC NO. M74981)

Dear Mr. Boulette:

By letters dated May 4, 1990, and October 3, 1994, Boston Edison Company (BECO), licensee for Pilgrim Nuclear Power Station (PNPS), responded to the subject Generic Letter (GL). BECO's response concluded that the instrumentation associated with the feedwater trip on high levels should not be added to the PNPS Technical Specifications (TSs).

The Nuclear Regulatory Commission's (NRC) Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors (58 FR 39132) established a specific set of objective criteria as guidance for determining which regulatory requirements and operating restrictions should be included in TSs. Criterion 3 of the final policy statement would require that the reactor vessel overfill protection system instrumentation be included in TSs if this instrumentation serves to protect any fuel safety limits.

BECO stated in the October 3, 1994, response that provide protection against exceedance of the main feedwater pump (MFP) trip is a plant design feature incorporated to protect equipment, but has no nuclear safety related function. The PNPS Updated Final Safety Analysis Report (UFSAR), Appendix G, Event 36, does not take credit for the MFP trip in the analysis. Therefore, BECO concluded that the instrumentation associated with the feedwater trip on high water level should not be added to the PNPS TSs.

The NRC staff has reviewed your responses and determined that the UFSAR design basis analysis and transients events do not take credit for the MFP trip in the accident analysis, the MFP trip is not credited for fuel protection in any design bases accident or abnormal operational transient in the UFSAR, and Pilgrim's Master Surveillance Tracking Program contains a procedural requirement to periodically verify availability and functionality of the MFP trip. In addition, operator training includes classroom and simulator training on the Boiling Water Reactor Owner's Group symptom-based emergency

NRC FILE CENTER COPY

9501130229 950110  
PDR ADDCK 05000293  
PDR

2001/10

E. Thomas Boulette

-2-

January 10, 1995

operating procedures for controlling the reactor water level during off-normal events. Therefore, the NRC staff agrees that the inclusion of the reactor vessel overfill protection system instrumentation is not required in the PNPS TSs.

Accordingly, TAC No. M74981 is closed by the issuance of this letter.

Sincerely,

Original signed by:  
Ronald B. Eaton, Senior Project Manager  
Project Directorate I-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket No. 50-293

cc: See next page

DISTRIBUTION:

Docket File

PUBLIC

PDI-3 Reading

SVarga

JZwolinski

WButler

SLittle

REaton

KJabbour

JWermiel

OGC

ACRS (4)

JLinville, RI

\* previously concurred

DOCUMENT NAME: A:\GL89-19.LTR

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	PDI-3:LA <i>SL</i>	<input checked="" type="checkbox"/> C	*NRR:HICB	<input type="checkbox"/>	*PDII-3:PM	<input type="checkbox"/>	PDI-3:PM <i>✓</i>	<input checked="" type="checkbox"/> E	PDI-3:D <i>BE</i>
NAME	SLittle		JWermiel		KJabbour		REaton		WButler
DATE	1/10/95		01/03/95		01/03/95		1/10/95		1/10/94

OFFICIAL RECORD COPY

E. Thomas Boulette

Pilgrim Nuclear Power Station

cc:

Mr. Leon J. Olivier  
Vice President of Nuclear  
Operations & Station Director  
Pilgrim Nuclear Power Station  
RFD #1 Rocky Hill Road  
Plymouth, MA 02360

Resident Inspector  
U. S. Nuclear Regulatory Commission  
Pilgrim Nuclear Power Station  
Post Office Box 867  
Plymouth, MA 02360

Chairman, Board of Selectmen  
11 Lincoln Street  
Plymouth, MA 02360

Office of the Commissioner  
Massachusetts Department of  
Environmental Protection  
One Winter Street  
Boston, MA 02108

Office of the Attorney General  
One Ashburton Place  
20th Floor  
Boston, MA 02108

Mr. Robert M. Hallisey, Director  
Radiation Control Program  
Massachusetts Department of  
Public Health  
305 South Street  
Boston, MA 02130

Regional Administrator, Region I  
U. S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Mr. Alan Shiever  
Licensing Division Manager  
Boston Edison Company  
600 Rocky Hill Road  
Plymouth, MA 02360-5599

Mr. Robert V. Fairbanks  
Manager, Reg. Affairs Dept.  
Pilgrim Nuclear Power Station  
RFD #1 Rocky Hill Road  
Plymouth, MA 02360

Mr. David F. Tarantino  
Nuclear Information Manager  
Pilgrim Nuclear Power Station  
RFD #1, Rocky Hill Road  
Plymouth, MA 02360

Mr. Thomas Rapone  
Secretary of Public Safety  
Executive Office of Public Safety  
One Ashburton Place  
Boston, MA 02108

Mr. David Rodham, Director  
Massachusetts Emergency Management  
Agency  
400 Worcester Road  
P.O. Box 1496  
Framingham, MA 01701-0317  
Attn: James Muckerheide

Chairmen, Citizens Urging  
Responsible Energy  
P. O. Box 2621  
Duxbury, MA 02331

Citizens at Risk  
P. O. Box 3803  
Plymouth, MA 02361

W. S. Stowe, Esquire  
Boston Edison Company  
800 Boylston St., 36th Floor  
Boston, MA 02199

Chairman  
Nuclear Matters Committee  
Town Hall  
11 Lincoln Street  
Plymouth, MA 02360