



BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

Roy A. Anderson
Senior Vice President - Nuclear

February 5, 1992
BECO 92-010

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

License DPR-35
Docket 50-293

Generic Letter 91-11; Resolution of Generic Issues 48 and 49

A review of the applicability of Generic Issue #48 "LCO's for Class 1E Vital Instrument Buses" and Generic Issue #49 "Interlocks and LCO's for Class 1E Tie Breakers" to Pilgrim Station's Electrical Distribution System, procedures and Technical Specifications was conducted. We conclude the following.

Generic Issue #48:

A review of the relevant Pilgrim Station procedures (2.2.12, 5.3.18, 5.3.19) for Vital Instrument Buses (Y3, Y31, Y13, Y4, Y41 and Y14), as defined in Generic Letter 91-11, indicates buses that require automatic and operator actions within specific time limits have requirements that are governed by the Technical Specification Limiting Conditions of Operations. The concerns addressed in Generic Issue #48 thus are included in our existing procedures.

The Reactor Protection System is not governed by a Limiting Condition of Operation because the loss of one train of RPS power results in a half scram condition that places the plant in a conservative, fail safe position. Any additional failure or false actuation of the RPS would result in a full scram.

Generic Issue #49:

A review of the PNPS Electrical Distribution System and related PNPS procedures indicates there are no interlocks or tie breakers in the permanent design of PNPS that have the capability of tying together both separated trains of redundant class 1E busses. Temporary ties are controlled administratively. This limits temporary ties to conditions where the reactor is shutdown with no fuel in the vessel.

As requested by the generic letter, we verified our existing procedures:

- Limit the time the plant is potentially subject to a single-failure.

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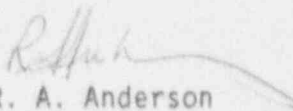
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- Require appropriate surveillance of these components.
- Ensure the plant is operating in an electrical configuration consistent with the regulations and its design bases.

This completes our response to this generic letter.


R. A. Anderson

RAH/cab/6688

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Senior NRC Resident Inspector
Pilgrim Nuclear Power Station

Commonwealth of Massachusetts)
County of Plymouth)

Then personally appeared before me, Roy A. Anderson, who being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My commission expires:

October 5, 1995
DATE


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