

BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

BECo Letter No. 84-102
July 12, 1984

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

Proposed Amendment to Facility Operating License:
Equalizer Valve Restriction

Dear Sir:

Pursuant to 10 CFR 50.90, Boston Edison Company (BECo) hereby proposes the following amendment to Facility Operating License No. DPR-35.

Proposed Change

This change deletes Condition 3.D, "Equalizer Valve Restriction", in its entirety. Condition 3.D currently reads "The valves in the equalizer piping between the recirculation loops shall be closed at all times during reactor operation". See the Attachment to this letter for revised Facility Operating License page 3.

Reason For Change

As a result of NRC Order titled "IGSCC Inspection Order Confirming Shut-down" dated August 26, 1983, BECo initiated the Recirculation System Piping Replacement Project. This project includes the removal of the 22" equalizer valves located between the recirculation loops. The replacement piping design specifies that the piping on both sides of the removed valves is to be capped. Therefore, the present license condition that the equalizer valves remain closed at all times is moot.

Safety Considerations

This change does not present an unreviewed safety question as defined in 10 CFR 50.59. It has been reviewed and approved by the Operations Review Committee and reviewed by the Nuclear Safety review and Audit Committee.

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Significant Hazards Considerations

It has been determined that this amendment request involves no significant hazards consideration. Under the NRC's regulations in 10 CFR 50.92, this means that operation of the Pilgrim Nuclear Power Station in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The NRC has provided guidance concerning the application of standards for determining whether license amendments involve significant hazards considerations by providing certain examples (48 FR 14870). One example of an amendment that is considered not likely to involve a significant hazards consideration is "... (i) a purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature."

Removal of the 22" equalizer valves and subsequent capping of the lines does not impact existing safety analyses. The purpose of the equalizing line was to interconnect the pump discharge lines so that one recirculation pump could deliver flow to the discharge lines if the other recirculation pump was shut-down. The present license condition prevents either valve in the equalizer line from being open during reactor operation. If these valves were open while a design basis LOCA were to occur, LPCI flow from both RHR loops would be prevented from reaching the core at design quantities due to discharge out of the break through the equalizing valves. The removal of these valves and the capping of the lines therefore does not constitute an unreviewed safety question. Since the equalizing valves will not exist in the replacement design, the license condition restriction on valve operation is no longer needed. This amendment request is an administrative change in that it deletes obsolete conditions from the facility operating license.

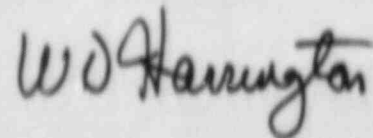
Schedule of Change

This change will be put into effect upon receipt of approval from the NRC.

Application Fee

Pursuant to 10 CFR 170.21 an application fee of \$150 is submitted with this amendment request.

Very truly yours,



TFF:pjd

Attachment

3 signed originals and 37 copies

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Commonwealth of Massachusetts
County of Suffolk

Then personally appeared before me W.D. Harrington, who, being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company, the applicant herein, 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 21, 1988*

Peter M. Kahler

cc: Mr. Robert M. Hallisey, Director
Radiation Control Program
Massachusetts Dept. of Public Health
600 Washington Street, Room 770
Boston, MA 02111

