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WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

BECO 84-169  
October 5, 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

Subject: Appendix J Review for PNPS

Reference: NRC Letter dated July 2, 1984 (BECO #1.84-188)

Dear Sir,

In the above letter, you requested we update our technical specification submittals of January 27, 1976 and June 4, 1976 by October 7, 1984. Please be advised that the January 27, 1976 and June 4, 1976 letters did not contain proposed technical specification changes. These letters only contained lists of primary containment isolation valves (PCIV's) requiring testing, PCIV's exempted from testing, and several exemption requests and clarifications.

Proposed technical specifications were submitted in our letter of October 10, 1975, and partially approved by your letter of July 23, 1976.

In preparing our response we have been reviewing the past correspondence on this subject. Your letter of August 12, 1980 requested further information on several valves. Our response of October 27, 1980 appears to have been misleading as is evidenced by Franklin Research Reports of May 5, 1981 and April 12, 1982, and the NRC safety evaluation transmitted with your July 2, 1984 letter.

These documents imply that we are testing RCIC valve 1301-50 and HPCI valve 2301-7 as the containment isolation boundary. Our containment boundary (as described in references 3 and 4 and as defined in the PNPS-FSAR Table 5.2-5, Rev. 4, July 22, 1984) is the 1301-49 and 2301-8 valve respectively. These are the containment isolation valves (1301-49 and 2301-8) tested under our current Appendix J Program.

Also, in our letter of January 27, 1976, Table 2 "Valves Disqualified as PCIV's, penetration X-21, Service Air to Drywell," we stated these valves would not be tested as:

"this line is a spare line capped inside the drywell. Line is exposed to Type A leak test pressure and any leakage is recorded in the Type A results."

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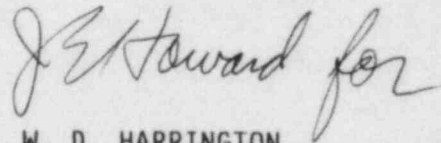
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This exemption request is still in effect and we hereby request approval.

Due to our present RFO #6 staffing requirements, we will be unable to submit revised technical specifications by October 7. As a result, a date of 120 days following completion of the startup test program (and related activities) from RFO #6 is our earliest possible response date. (At present it is estimated that these activities will be completed by January 1, 1985.)

Should you have any questions or concerns on the above, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. E. Howard for", written in dark ink.

W. D. HARRINGTON

MTL/ns

ATTACHMENT 1

References:

- 1) NRC letter dated July 2, 1984 (BEC0 #1.84.188)
- 2) BECo letter dated October 10, 1975
- 3) BECo letter dated January 27, 1976 (BEC0 #2.76-11)
- 4) BECo letter dated June 4, 1976 (BEC0 #2.76-48)
- 5) NRC letter dated July 23, 1976
- 6) NRC letter dated August 12, 1980 (BEC0 #1.80.302)
- 7) BECo letter dated October 27, 1980 (BEC0 #2.80-275)
- 8) Franklin Research Report-TER-C5257-40 dated May 5, 1981
- 9) Franklin Research Report-TER-C5257-548 dated April 12, 1982
- 10) PNPS FSAR Table 5.2-5, Revision 4, July 22, 1984