

APR 08 1992

Docket No. 50-293

Boston Edison Company
ATTN: Mr. Roy A. Anderson
Senior Vice President-Nuclear
Pilgrim Nuclear Power Station
RFD #1 Rocky Hill Road
Plymouth, Massachusetts 02360

Dear Mr. Anderson:

SUBJECT: PILGRIM NUCLEAR POWER STATION - TEMPORARY WAIVER OF COMPLIANCE FROM TECHNICAL SPECIFICATIONS

By letter dated April 7, 1992 and by conference call on April 7, 1992, the Boston Edison Company (BECo) requested waiver of Technical Specification Limiting Conditions for Operations associated with reactor vessel water level instrumentation as listed in the enclosure to the letter. Specifically, the BECo request was to permit reactor startup for the purpose of conducting post modification testing of the "B" reference leg, whose associated instrumentation would be considered inoperable pending satisfactory testing. The "B" reference leg was modified to resolve reactor vessel water level spiking experienced during plant shutdowns. The request stated reactor operations would be limited to not more than 15% of rated power, for a period not to exceed 96 hours. BECo concluded the waiver was necessary to comply with post modification testing requirements as stated in the station Quality Assurance Manual and that plant operation in accordance with this request would not create a significant hazard to the health and safety of the public.

The request for waiver was discussed by myself, Jose Calvo, and other NRC staff personnel with Mr. E. T. Boulette and other BECo personnel during the April 7, 1992 telephone conference. At that time, the NRC understood BECo to commit to the following conditions under which the waiver request was viewed:

- With the exception of the "B" reference leg post modification testing, only Technical Specification required testing, surveillance activities, and minor maintenance will be authorized.
- All applicable Technical Specification required surveillances related to reactor vessel level instrumentation would be current, including instrumentation affected by the waiver request.

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- Existing Technical Specification requirements remain in effect with respect to the inoperability of "B" reference leg instrumentation for any reason other than that described in the waiver request.
- The waiver would immediately terminate and all existing Technical Specification action statements would apply if one or more instruments on the "A" reference leg were to become inoperable.
- The waiver would authorize BECo to conduct one reactor startup to low power operations and subsequent controlled shutdown and reactor vessel depressurization for the purpose of completing the post modification testing.
- BECo would notify the NRC if any waiver conditions or commitments described herein were not met.

After careful evaluation of your waiver request and your subsequent commitment to the additional NRC conditions, the NRC staff concluded that reactor operation in this condition has minimal affect on reactor safety. As described in your waiver request, you have established reasonable assurance that modification to the "B" reference leg will ensure the associated instrumentation will perform as designed. However in order to conduct a comprehensive post modification test, the reactor must enter an operational mode in which the affected instrumentation is required to be operable. As such, request for a waiver of compliance from the applicable Technical Specification requirements was appropriate.

Therefore, a one-time Regional Waiver of Compliance, consistent with your waiver request and the commitments above, is granted from the requirements of the applicable reactor vessel water level instrumentation Technical Specification Limiting Conditions for Operations for the sole purpose of conducting post modification testing of the "B" reference leg.

Sincerely,

ORIGINAL SIGNED BY:

Charles W. Hehl, Director
Division of Reactor Projects

Enclosure: April 7, 1992 BECo Request for Waiver of Compliance (Revised)

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cc w/encl:

E. Boulette, Vice President, Nuclear Operations and Station Director
E. Kraft, Plant Manager
J. Dietrich, Licensing Division Manager
V. Oheim, Manager, Regulatory Affairs Department
D. Tarantino, Nuclear Information Manager
N. Desmond, Compliance Division Manager
R. Hallisey, Department of Public Health, Commonwealth of Massachusetts
R. Adams, Department of Labor and Industries, Commonwealth of Massachusetts
D. Long, Security Group Leader
The Honorable Edward M. Kennedy
The Honorable John F. Kerry
The Honorable Edward J. Markey
The Honorable Edward P. Kirby
The Honorable Peter V. Doherty
B. McIntyre, Chairman, Department of Public Utilities
Chairman, Plymouth Board of Selectmen
Chairman, Duxbury Board of Selectmen
Plymouth Civil Defense Director
Paul W. Gromer, Massachusetts Secretary of Energy Resources
Sarah Woodhouse, Legislative Assistant
A. Noguee, MASSPIRG
Regional Administrator, FEMA
Office of the Commissioner, Massachusetts Department of Environmental Quality
Engineering
Office of the Attorney General, Commonwealth of Massachusetts
T. Rapone, Massachusetts Executive Office of Public Safety
Chairman, Citizens Urging Responsible Energy
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
K. Abraham, PAO (2 copies)
NRC Resident Inspector
Commonwealth of Massachusetts, SLO Designee

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- bcc w/encl:
- Region I Docket Room (with concurrences)
- Management Assistant, DRMA (w/o encl)
- DRS SALP Coordinator
- DRSS SALP Coordinator
- J. Linville, DRP
- J. Rogge, DRP
- J. Macdonald, SRI - Pilgrim
- M. Conner, SALP Reports Only
- W. Butler, NRR
- R. Eaton, NRR
- R. Lobel, OEDO
- T. Martin, RA
- W. Kane, DRA
- C. Hehl, DRP
- J. Wiggins, DRP
- M. Knapp, DRSS
- W. Hodges, DRS
- W. Lanning, DRS
- J. Duff, DRS
- L. Bettenhausen, DRS
- J. Joyner, DRSS

*Carla Cocon
with comment*

RI:DRP

NRE

RI:DRP

RI:DRP

RI:DRP

Macdonald/meo
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Eaton
Rogge
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Linville

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Hehl

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