

BOSTON EDISON COMPANY  
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

August 15, 1984

BECo #84-135

Mr. Darrell G. Eisenhut, Director  
Director of Licensing  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

License No. DPR-35  
Docket No. 50-293

Reference: Generic Letter 84-15: Proposed Staff Actions to Improve  
and Maintain Diesel Generator Reliability

Subject: Request for Extension to Submit Response to Generic  
Letter 84-15

Dear Sir:

Boston Edison Company (BECo) has reviewed the referenced Generic Letter 84-15, dated July 2, 1984. This letter requires BECo to submit information to the NRC on or before October 1, 1984, regarding diesel generator (DG) surveillance tests, reliability data and reliability programs, or request an extension by August 16, 1984. BECo has developed a plan and schedule related to diesel generator reliability to address these issues. Based on this plan, BECo herein requests an extension to January 31, 1985, to submit a response. Our justification for the requested extension is as follows:

- a) At present, BECo is engaged in RFO#6 which involves modifications related to recirculation pipe. BECo has committed all available resources to conduct and manage outage related activities, thus the BECo Staff would not be available until after the start up of PNPS. BECo intends to complete the planned and on going outage related activities on schedule.
- b) A preliminary review of the DG Surveillance Testing frequencies related to cold fast start ups and ECCS, indicates that a reliability analysis would be required to propose any changes in technical specifications (TS). This reliability analysis would be the basis for a no significant hazards consideration determination for proposed T.S. changes. Further, to fully evaluate and to address the guidance of NUREG/CR-0660 and the Staff proposed reliability program, it is estimated that at least 120 days would be required following the start up of PNPS.

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Mr. Darrell G. Eisenhut

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We believe our request for extension is justified for the aforementioned reasons, and because sufficient time to evaluate diesel generator reliability is essential in formulating any meaningful changes in the technical specifications.

Should you require further information concerning this request, please contact us.

Very truly yours,

*W.D. Harrington*

WGL/ns

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: *JUNE 20, 1991*

*Dorothy M. Lopez*  
Notary Public