

Attachment A

Proposed Technical Specification Changes

NOTE: Because of a prior license amendment request involving the deletion of Licensee Event Report requirements (Ref. Gen. Ltr. 83-43, 12/19/83), it will be noted, when reviewing the following submittal, that certain paragraphs of Section 6 incorporate the previously requested changes. This was done at the request of the NRC's Pilgrim Station Project Manager, Mr. Paul Leech and to simplify the review of this submittal.

Proposed Change:

Reference is made to Pilgrim Nuclear Power Station, Technical Specifications Sections 6.1 thru 6.8 and, Figures 6.2.1 and 6.2.2. The following changes are requested to be made:

1) Section 6.1, pg. 208

Change: "The Station Manager shall be accountable for overall facility operation. In his absence the Station Manager shall designate in writing the individual to assume this responsibility."

To: "The Nuclear Operations Manager shall be accountable for overall facility operation. In his absence the Nuclear Operations Manager shall designate in writing the individual to assume this responsibility".

2) Section 6.5.A.1, pg. 212

Change: The ORC shall function to advise the Station Manager on all matters related to safety".

To: "The ORC shall function to provide timely and continuing review of all aspects of plant operation and to advise the Nuclear Operations Manager on all matters related to nuclear safety".

3) Section 6.5.A.2, pg. 212

Change the entire Section 2 entitled "Composition".

Change: 2. COMPOSITION

The ORC shall be composed of the

Chairman:	Station Manager
Member:	Chief Operating Engineer
Member:	Chief Technical Engineer
Member:	Chief Maintenance Engineer
Member:	Chief Radiological Engineer
Member:	Onsite Safety & Performance Group Leader

The ORC Chairman may appoint subcommittees composed of personnel who are not members of ORC to perform staff work necessary to the efficient functioning of ORC.

To: 2. COMPOSITION

The ORC shall be composed of the:

Chairman: Technical Section Head, or designated alternate

Members: Chief Operating Engineer, or designated alternate

Chief Maintenance Engineer, or designated alternate

Chief Technical Engineer, or designated alternate

Chief Radiological Engineer, or designated alternate

Chief Chemical Engineer, or designated alternate

Onsite Safety and Performance Group Leader, or designated alternate

4) Section 6.5.A.3, pg. 212

Change: "Alternate members shall be appointed in writing by the ORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate in an ORC quorum at any one time".

To: "Alternates shall be appointed in writing by the Nuclear Operations Manager to serve on a temporary basis".

5) Section 6.5.A.5, pg. 212

Change: "A quorum of the ORC shall consist of the Chairman and a majority of members including alternates".

To: "A quorum of the ORC shall consist of the Chairman or designated alternate and a majority of members/designated alternates; however, no more than two alternates shall be allowed to meet quorum requirements".

6) Section 6.5.A.6, pg. 212

Change: "e. Investigation of all violations of the Technical Specifications.....to the Vice President - Nuclear Operations and to the NSRAC Chairman".

To: "j. Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Nuclear Operations Manager and to the NSRAC Chairman."

Note: A re-arrangement of the list of responsibilities will be necessary due to the above changes.

(Section 6.5.A.6 continued on page 213)

Change: "1. Provide immediate written notification to the Vice President - Nuclear Operations and the ORC Chairman. The Vice President - Nuclear Operations shall have responsibility for resolution for such disagreements."

To: "1. Provide immediate written notification to the Nuclear Operations Manager and the Nuclear Safety Review and Audit Committee, of disagreement between the ORC Members and the ORC Chairman. The Nuclear Operations Manager shall have responsibility for resolution for such disagreement.

Add as a new paragraph:

The ORC Chairman may appoint subcommittees composed of personnel who are not members of ORC to perform staff work necessary to the efficient functioning of ORC.

7) Section 6.5.A.7, pg. 213

Change: "7. Authority

The ORC shall report to and advise the Station Manager on those areas of responsibility specified in Section 6.5.A.6."

To: "7. Authority

- a. The ORC shall act as advisor to the Nuclear Operations Manager (NOM) on all matters related to nuclear safety and recommend proposals considered under Sections 6.5.A.6(a) through (h) above for NOM approval.
- b. The ORC may reject proposals submitted pursuant to Sections 6.5.A.6(a) through (h) above which do not satisfy the Committee's concerns."

8) Section 6.5.A.8, pg. 213

Change: "8. RECORDS

The ORC shall maintain written minutes of each meeting and copies shall be provided to the Vice President - Nuclear Operations."

To: "8. RECORDS

The ORC shall maintain written Minutes of each meeting and copies shall be forwarded to the Nuclear Operations Manager and the Nuclear Safety Review and Audit Committee Chairman."

9) Section 6.5.B.10, pg. 216

Change: "b. Reports of reviews, with a copy to the Station Manager within 21 days following the completion of the review."

To: "b. Reports of reviews, with a copy to the Nuclear Operations Manager within 21 days following the completion of the review.

10) Section 6.6, pg. 216

Change: "B. Each Reportable Event Report . . . and the Station Manager."

To: "B. Each Reportable Event Report . . . and the Nuclear Operations Manager."

11) Section 6.7, pg. 216

Change: "B. The Safety Limit Violation shall be reported to the Commission within 1 hour per 10CFR50.36(c)(6) and 50.72, and to the Station Manager and the NSRAC Chairman immediately.

To: "B. The Safety Limit Violation, and to the Nuclear Operations Manager and the NSRAC Chairman immediately."

Change: "D. The Safety Limit Violation Report shall be submitted to the Commission within 30 days in accordance with 10CFR50.36(c)(7) and 50.73 and to the NSRAC Chairman and the Station Manager.

To: "D. The Safety Limit Violation Report shall be submitted to the Commission, the NSRAC Chairman and the Nuclear Operations Manager.

12) Section 6.8, pg. 216

Change: "B. Each procedure of 6.8.A above, and changes thereto, shall be reviewed by the ORC and approved by the Station Manager prior to implementation."

To: "B. Each procedure of 6.8.A above, and changes thereto, shall be reviewed by the ORC and approved by the Nuclear Operations Manager prior to implementation."

13) Section 6.8.C, pg. 217

Change: "3. The change is documented, reviewed subsequently by the ORC, and approved by the ORC Chairman within 7 days of implementation."

To: "3. The change is documented, subsequently reviewed by the ORC within 7 days of implementation, and approved by the Nuclear Operations Manager."

Reason for Change

Organization changes, referred to in BECo Letter No. 83-307 (Reference 1), have been approved, thereby necessitating revisions to the PNPS Administrative Technical Specifications. These changes transfer the Technical Section, which reported to the corporate on-site representative (Director of Operations Review) to a position reporting to the Nuclear Operations Manager. A new position of Technical Section Head has been formed to oversee this group which will now consist of the On-site Safety and Performance Group and the Technical Group. This new position will also assume the responsibility as Chairman of the Operations Review Committee.

Also within this reorganization, a separate water chemistry group has been formed to provide the dedicated manpower and associated resources to improve our Chemistry Control Program. The water-chemistry control group will be headed by a new position, Chief-Chemical Engineer, and will report directly to the Nuclear Operations Manager. This new position also will be a member of the ORC.

With this reorganization, BECo has endeavored to increase the effectiveness of organizational lines of responsibility and available human resources.

Safety Considerations

The proposed changes revise most parts of Section 6 and Figures 6.2.1 and 6.2.2 of the Administrative Technical Specifications for Pilgrim Nuclear Power Station. The changes are all administrative in nature and have no safety significance, do not physically affect plant safety related systems, and do not reduce any safety margin. Therefore, the changes do not present an unreviewed safety question as defined in 10CFR50.52(c).

The changes have been reviewed and approved by the Operations Review Committee and reviewed by the Nuclear Safety Review and Audit Committee.

Safety Hazards Considerations

The Commission has provided guidance concerning the application of the standards by providing certain examples (48FR14870). One of these examples (1), involving no significant hazards consideration is "a purely administrative change to Technical Specifications." The requested amendment matches this example.

Schedule of Change

This proposed amendment will be put into effect upon receipt by the NRC.

Pages affected by this proposed change are as follows:

208
208a*
209
210
212
213
214
215*
216
217
218*

*These pages have only been renumbered, there are no changes to the text.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

The Nuclear Operations Manager shall be accountable for overall facility operation. In his absence the Nuclear Operations Manager shall designate in writing the individual to assume this responsibility.

6.2 ORGANIZATION

A. OFFSITE

The Company organization for station management and technical support shall be as shown on Figure 6.2.1.

B. FACILITY

The Facility organization shall be as shown on Figure 6.2.2 and:

1. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.1.
2. When the unit is in an operational mode other than cold shutdown or refueling, a person holding a Senior Reactor Operator License shall be present in the control room at all times. In addition to this Senior Operator, a Licensed Operator or Senior Operator shall be present at the controls when fuel is in the vessel.
3. At least two Licensed Operators shall be present in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips.
4. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
5. ALL CORE ALTERATIONS performed while fuel is in the reactor vessel after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
6. A Fire Brigade of 5 members including a Fire Brigade Leader shall be maintained on site at all times. This excludes 3 members of the minimum shift crew necessary for safe shutdown and any personnel required for other essential functions during a fire emergency.

C. CHANGES TO THE ORGANIZATION

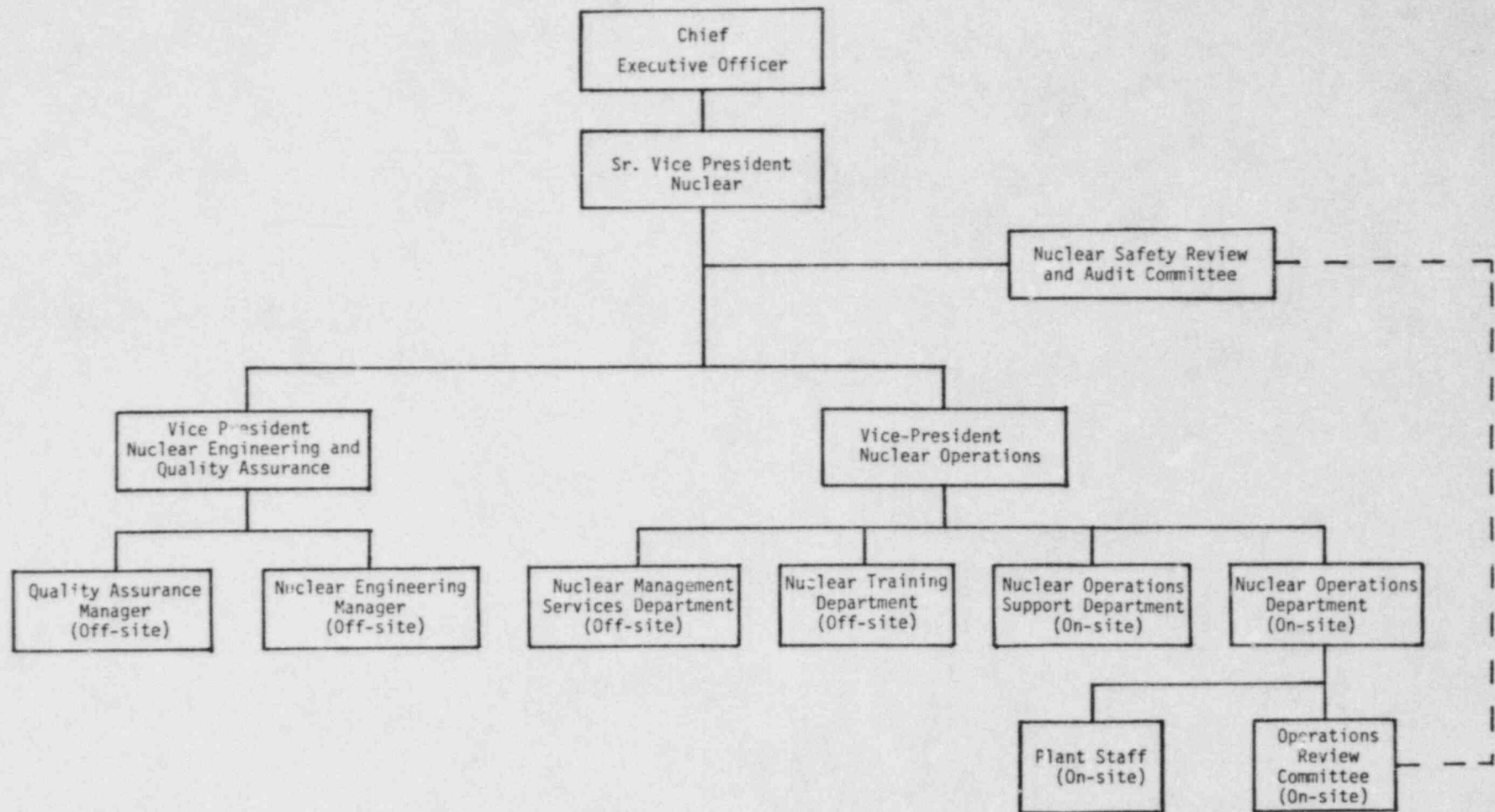
Changes may be made to the organization without prior license amendment provided that a revision to Section 6.2 is included in a subsequent license amendment request.

6.3 FACILITY STAFF QUALIFICATIONS

The qualifications with regard to educational and experience backgrounds of the facility staff at the time of appointment to the active position shall meet the requirements as described in the American National Standards Institute N18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants." In addition, the individual performing the function of Radiation Protection Manager shall meet or exceed the qualifications of Regulatory Guide 1.8, September, 1975.

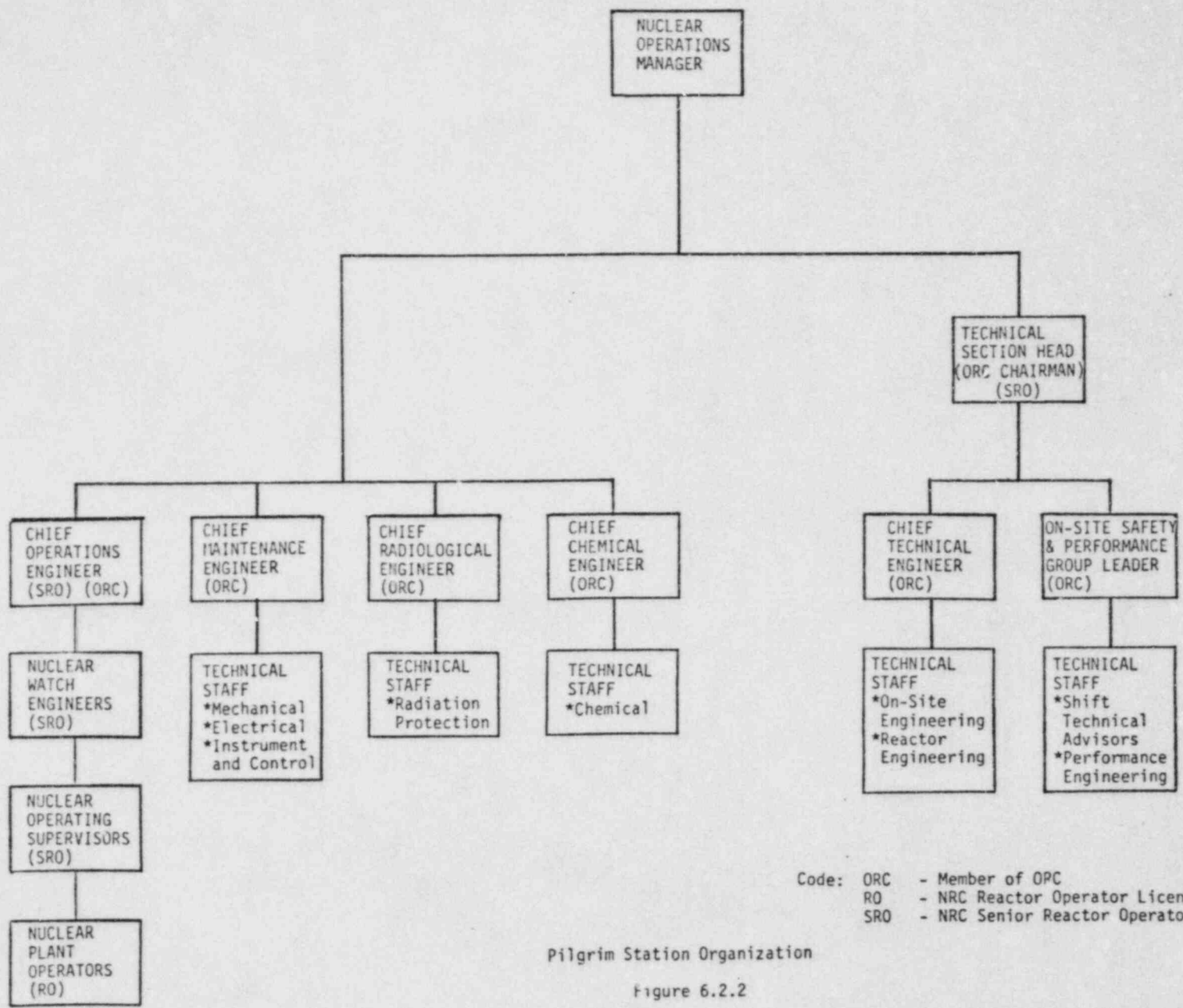
6.4 TRAINING

A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager. The training programs for the licensed personnel shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10CFR Part 55. The training programs for the Fire Brigade shall meet or exceed the requirements of NFPA Standard No. 27-1975 "Private Fire Brigade". Fire Protection Training sessions will be held quarterly.



Boston Edison Company -
 Organization for Operation of Pilgrim I

Figure 6.2.1



Code: ORC - Member of OPC
 RO - NRC Reactor Operator License
 SRO - NRC Senior Reactor Operator License

Pilgrim Station Organization

Figure 6.2.2

6.5 REVIEW AND AUDIT

A. OPERATIONS REVIEW COMMITTEE (ORC)

1. FUNCTION

The ORC shall function to provide timely and continuing review of all aspects of plant operation and to advise the Nuclear Operations Manager on all matters related to nuclear safety.

2. COMPOSITION

The ORC shall be composed of the:

Chairman: Technical Section Head, or designated alternate

Members: Chief Operating Engineer, or designated alternate

Chief Maintenance Engineer, or designated alternate

Chief Technical Engineer, or designated alternate

Chief Radiological Engineer, or designated alternate

Chief Chemical Engineer, or designated alternate

Onsite Safety and Performance Group Leader, or designated alternate

3. ALTERNATES

Alternates shall be appointed in writing by the Nuclear Operations Manager to serve on a temporary basis.

4. MEETING FREQUENCY

The ORC shall meet at least once per calendar month and as convened by the ORC Chairman.

5. QUORUM

A quorum of the ORC shall consist of the Chairman or designated alternate and a majority of members/designated alternates; however, no more than two alternates shall be allowed to meet quorum requirements.

6. RESPONSIBILITIES

The ORC shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto that affect nuclear safety.

6. RESPONSIBILITIES (Cont.)

- b. Review all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Review of facility operations to detect potential safety hazards.
- f. Review of the Station Security Plan and implementing procedures and changes to the plan and procedures.
- g. Review of the Emergency Plan and implementing procedures and changes to the plan and procedures.
- h. Review the Station Fire Protection Plan and implementing procedures and changes to the plan and procedures.
- i. Performance of special reviews and investigations and reports thereon as requested by the NSRAC Chairman.
- j. Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Nuclear Operations Manager and to the NSRAC Chairman.
- k. Render determinations in writing with regard to whether or not each item considered under 6.5.A.5(a) through (e) above constitutes an unreviewed safety question.
- l. Provide immediate written notification to the Nuclear Operations Manager and the Nuclear Safety Review and Audit Committee, of disagreement between the ORC Members and the ORC Chairman. The Nuclear Operations Manager shall have responsibility for resolution for such disagreements.

The ORC Chairman may appoint subcommittees composed of personnel who are not members of ORC to perform staff work necessary to the efficient functioning of ORC.

7. AUTHORITY

- a. The ORC shall act as advisor to the Nuclear Operations Manager (NOM) on all matters related to nuclear safety and recommend proposals considered under Sections 6.5.A.6(a) through (h) above for NOM approval.
- b. The ORC may reject proposals submitted pursuant to Sections 6.5.A.6(a) through (h) above which do not satisfy the Committee's concerns.

8. RECORDS

The ORC shall maintain written Minutes of each meeting and copies shall be forwarded to the Nuclear Operations Manager and the Nuclear Safety Review and Audit Committee Chairman.

B. NUCLEAR SAFETY REVIEW AND AUDIT COMMITTEE (NSRAC)

1. FUNCTION

The NSRAC shall function to provide independent review and audit of designated activities in the areas of:

1. nuclear power plant operations;
2. nuclear engineering;
3. chemistry and radiochemistry;
4. metallurgy;
5. instrumentation and control;
6. radiological safety;
7. mechanical and electrical engineering;
8. quality assurance practices
9. fire protection

2. COMPOSITION

The NSRAC Chairman and other members shall be appointed by the Senior Vice President - Nuclear, or such other person as he shall designate. NSRAC members shall collectively possess experience and competence required to review and audit the designated areas noted in 6.5.B.1.

The collective competence of the committee will be maintained as changes to the membership are made. The membership shall consist of a minimum of five persons.

3. ALTERNATES

Alternate members shall be appointed in writing by the Senior Vice President - Nuclear or the chairman to serve on a temporary basis; however, no more than two alternates shall participate in a quorum at any one time.

4. CONSULTANTS

Consultants shall be utilized as determined by the NSRAC Chairman to provide expert advice to the NSRAC.

5. MEETING FREQUENCY

The NSRAC shall meet at least once per six months.

6. QUORUM

A quorum of the NSRAC shall consist of the Chairman and a majority of the NSRAC members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

7. REVIEW

The NSRAC shall review:

a. The safety evaluations for:

- (1) Changes to procedures, equipment or systems and
- (2) Tests or experiments completed under the provision of Section 50.59, 10 CFR

to verify that such actions did not constitute an unreviewed safety question.

- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes in Technical Specifications or operating license.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that effect nuclear safety.
- g. All events which are required by 10 CFR 50.73 to be reported to the NRC in writing.
- h. Any other matter involving safe operation of the nuclear plant which NSRAC deems appropriate for consideration or which is referred to NSRAC for the onsite operating organization or by other functional organizational units within Boston Edison.
- i. Reports and meeting minutes of the Operations Review Committee.

8. AUDITS

Audits of facility activities shall be performed under the cognizance of the NSRAC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The training and qualifications of the entire facility staff at least once per year.

- c. The results of all actions required by deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.
- d. The performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per two years.
- e. The Emergency Plan and implementing procedures at least once per two years.
- f. The Station Security Plan and implementing procedures at least once per two years.
- g. Any other area of facility operation considered appropriate by the NSRAC or the Senior Vice President - Nuclear.
- h. The Fire Protection Program and implementing procedures at least once per two years.

9. AUTHORITY

The NSRAC shall report to and advise the Senior Vice President - Nuclear on those areas of responsibility specified in Section 6.5.B.7 and 6.5.B.8.

10. RECORDS

Records of NSRAC activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each NSRAC meeting shall be prepared, approved and forwarded to the Senior Vice President - Nuclear, NSRAC members, and others the Chairman may designate, within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.B.7 e, f, g and h above, shall be prepared, approved and forwarded to the Senior Vice President - Nuclear, with a copy to the Nuclear Operations Manager within 21 days following the completion of the review.
- c. Audit reports encompassed by Section 6.5.B.8 above shall be forwarded to the Senior Vice President - Nuclear and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE EVENT ACTION

The following actions shall be taken for each reportable event:

- A. The Commission shall be notified and/or a report submitted pursuant to the requirements of either 10 CFR 50.72 or 10 CFR 50.73.
- B. Each Reportable Event Report submitted to the Commission shall be reviewed by the ORC and submitted to the NSRAC Chairman and the Nuclear Operations Manager.

6.7 SAFETY LIMIT VIOLATION

The following actions shall be taken in the event a Safety Limit is violated:

- A. The provisions of 10 CFR 50.36(c) (1) (i) shall be complied with immediately.
- B. The Safety Limit Violation shall be reported to the Commission within 1 hour per 10CFR50.36(c)(6) and 50.72, and to the Nuclear Operations Manager and the NSRAC Chairman immediately.
- C. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the ORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- D. The Safety Limit Violation Report shall be submitted to the Commission within 30 days in accordance with 10CFR50.36(c)(7) and 50.73 and to the NSRAC Chairman and the Nuclear Operations Manager.

6.8 PROCEDURES

- A. Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7 - 1972 and Appendix "A" of USNRC Regulatory Guide 1.33, except as provided in 6.8.B and 6.8.C below.
- B. Each procedure of 6.8.A above, and changes thereto, shall be reviewed by the ORC and approved by the Nuclear Operations Manager prior to implementation. These procedures shall be reviewed periodically as set forth in administrative procedures.

NOTE: ORC review and approval of procedures for vendors/contractors, who have a QA Program approved by Boston Edison Company, is not required for work performed at the vendor/contractor facility.

- C. Temporary changes to procedures of 6.8.A above may be made provided:
 1. The intent of the original procedure is not altered.
 2. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's license on the unit affected.
 3. The change is documented, subsequently reviewed by the ORC within 7 days of implementation, and approved by the Nuclear Operations Manager.
- D. Written procedures to implement the Fire Protection Program shall be established, implemented and maintained.

6.9 REPORTING REQUIREMENTS

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the Director of the appropriate Regional Office of Inspection and Enforcement unless otherwise noted.

Routine Reports

1. Startup Report. A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the tests identified in the FSAR and shall in general include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

2. Monthly Operating Report. Routine reports of operating statistics, shutdown experience and forced reductions in power shall be submitted on a monthly basis to Director, Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, to arrive no later than the 15th of each month following the calendar month covered by the report.

The Monthly Operating Report shall include a narrative summary of operating experience that describes the operation of the facility, including safety-related maintenance, for the monthly report period.

3. Occupational Exposure Tabulation. A tabulation of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions, e.g. reactor operations and surveillance inservice inspection, routine maintenance, special maintenance (including a description), waste processing, and refueling shall be submitted on an annual basis. This tabulation supplements the requirements of 20.407 of 10 CFR 20. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.