

BOSTON EDISON COMPANY
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BOSTON, MASSACHUSETTS 02199

November 20, 1984
BECO 84-197

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

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 DPR-35
Docket 50-293

NUREG-0737, Item II.E.4.2 (6),
Operability of Purge Vent Valves

Dear Sir:

By letter dated September 24, 1984, the NRC provided the results of its review concerning Boston Edison's (BECO) substitution of 8" Clow Tricentric valves for the 20" butterfly-type valves which were part of the original plant design. This review concluded that the Clow valves would close against the buildup of containment pressure in the event of a LOCA, and that therefore Pilgrim met position II.E.4.2 (6) of NUREG-0737.

The September 24 letter also requested that BECO compare current purge/vent operability and surveillance technical specifications with Model Technical Specifications supplied as attachment 4 of your July 30, 1982 letter, and thereby determine if the installation of different valves warranted technical specification changes.

A review of Pilgrim technical specifications indicates that the existing surveillance frequency is once per operating cycle (4.7.D), and that the limiting conditions (3.7.D.1, 2 and 3) of operation are similar to the Model.

A minor deviation is that technical specification 3.7.D.2 requires that the position of the other containment isolation valve in a line with an inoperable valve must be placed in the isolation condition, and 4.7.D.2 requires that the position be recorded daily. The Model requires that the operable (other) valve be locked closed, and subsequently verified closed every 31 days. BECO does not believe that this minor deviation warrants a change because item (7), of the Clarification found on page 3-91 of NUREG-0737 states that checking the valve position light in the control room every 24 hours is considered an adequate method of verifying that the valve is closed. The objective of preventing a pathway to the environs when a line has an inoperable valve is adequately provided by existing technical specifications.

At present no special requirements exist concerning purge/vent leakage resulting from resilient seat degradation. In our report to you of April 6, 1984, we confirmed that the 8" Clow valves do not employ resilient seats;

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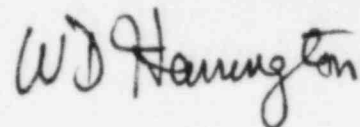
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therefore, in conformance with your letter of April 11, 1984, which states that accelerated leakage integrity tests only apply to valves employing resilient seats, BECo finds no need to incorporate an accelerated purge/vent valve leakage testing schedule into technical specification.

In sum, we find that existing Pilgrim purge/vent related technical specifications are in general conformance with the supplied Model, and that the installation of different valves does not require any amendment of present technical specifications. Should you wish further information on this issue, please contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read "W.D. Harrington". The signature is written in a cursive style with a large, prominent initial "W".

PMK/ns