



BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

10CFR50.90

Roy A. Anderson
Senior Vice President - Nuclear

August 10, 1992
BEC0 92-097

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

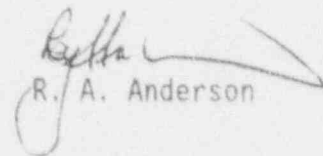
License DPR-35
Docket 50-293

Proposed Change to the Station
Batteries Surveillance Technical Specifications

Boston Edison Company proposes changes to the Pilgrim Nuclear Power Station surveillance requirements and associated Bases section for the station batteries to conform with current industry practices and manufacturer's recommendations.

The requested changes are described in Attachment A, the revised Technical Specification pages are in Attachment B, and Attachment C provides the existing pages marked-up to show the proposed changes.

We request timely approval of this revision because we plan to initiate the revised surveillance during the next refuel outage (RFO #9), presently scheduled to commence April 3, 1993.


R. A. Anderson

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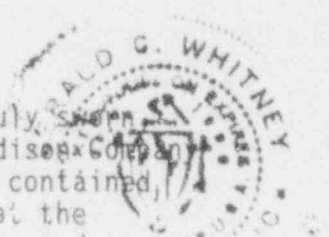
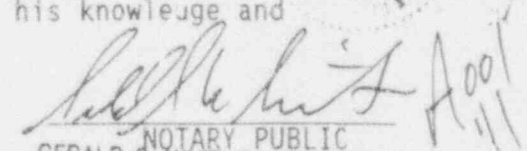
1 Signed Original and 37 Copies

cc: See Page 2

Commonwealth of Massachusetts)
County of Plymouth)

Then personally appeared before me, Roy A. Anderson, who being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company 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: MAR 4 - 1999
DATE



NOTARY PUBLIC
GERALD G. WHITNEY, Notary Public
My Commission Expires March 4, 1999

BOSTON EDISON COMPANY

U. S. Nuclear Regulatory Commission

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ATTACHMENT A

Proposed Change to the Station Batteries Surveillance Test Technical Specifications

Description of Change:

Boston Edison Company (BECO) proposes to revise the technical specification (TS) surveillance requirements for the station batteries. The present TS Section 4.9.A.2 requires a rated load discharge test be performed on the station batteries once per cycle. The proposed change consists of replacing the rated load discharge test with a Service Discharge Test once per cycle and a Performance Discharge Test every five years in place of the service test that would normally occur within that time frame. The proposed change clarifies and expands the discharge testing requirement to be consistent with the manufacturer's recommended testing, current industry practices, and the testing specified in ANSI/IEEE-450 - 1987. This change will increase plant safety by increasing battery availability and minimize test-related degradation of the batteries. The proposed change is consistent with amendments previously approved for Vermont Yankee Nuclear Power Station (Amendment No. 125, dated August 23, 1990) and Duane Arnold Energy Center (Amendment 179, dated March 2, 1992).

Reason for Change:

Pilgrim Nuclear Power Station (PNPS) Technical Specification Section 4.9.A.2.C requires the station batteries to be subjected to a rated load discharge test each operating cycle. BECO currently interprets this requirement to mean a Performance Test as defined in ANSI/IEEE-450 - 1987. It consists of applying the battery's rated load for a specific discharge period to detect any change in the capacity of the battery. ANSI/IEEE-450 - 1987 recommends the above-described Performance Test be performed once every five years. Since PNPS presently performs this test on a once-per-cycle interval, changing to every five years is consistent with the ANSI standard and general industry practice. Section 5.3 "Service" of ANSI/IEEE-450 - 1987 defines a Service Test as a test of the battery's ability, as found, to satisfy the design requirements (battery duty cycle) of the dc system. A once-per-cycle interval is proposed because this type of test requires the batteries be isolated, and the surveillance interval is best scheduled to coincide with planned outages.

The manufacturer of the safety-related batteries installed at PNPS also recommends the same testing and frequency as the IEEE standard. The manufacturer further states that deep-cycle discharging (such as the Performance Discharge Test referred to above) can be detrimental to the batteries and could significantly shorten the qualified life of the batteries.

Determination of No Significant Hazards Consideration:

The Code of Federal Regulations (10CFR50.91) requires licensees requesting an amendment to provide an analysis, using the standards in 10CFR50.92, that determines whether a significant hazards consideration exists. The following analysis is provided in accordance with 10CFR50.91 and 10CFR50.92 for the proposed amendment:

- 1) Operation of PNPS in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated because the requested revisions do not affect previous analyses involving these systems.

The proposed revisions affect only the surveillance requirements for the station batteries to make them conform with the manufacturer's recommendations and current industry guidance. The proposed change will require testing in a way more representative of use of the batteries by applying the design load (i.e., present load plus margin) for the time period required. This test retains the capability of detecting a degraded cell or battery and reduces the time required for the batteries to recharge, thereby increasing the overall availability of safety-related batteries.

- 2) Operation of PNPS in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated because there is no equipment or design change associated with this proposed amendment. The proposed amendment only changes the surveillance requirements for the batteries to conform to the current industry guidance.
- 3) Operation of PNPS in accordance with the proposed amendment will not involve any reduction in a margin of safety because the station batteries will still be available to supply power to the associated safety-related loads. The amendment only revises the surveillance requirements such that the Performance Discharge Test (rated amp-hour discharge) will be performed less frequently (every 5 years) increasing the useful life of the batteries while still maintaining a capacity profile. In addition, a Service Discharge Test (load profile) is being added and will be performed each cycle a Performance Discharge Test is not performed. The Service Discharge Test will demonstrate each battery's ability to supply the required loads for the time required.

The Operations Review Committee has reviewed and recommended approval of this change by the Station Director. It was also reviewed by the Nuclear Safety Review and Audit Committee.

Schedule of Change:

This change will be implemented within 30 days following BECo's receipt of its approval by the NRC.

We intend to initiate the new testing interval during RFO #9. Therefore, we request approval of this proposed amendment prior to shutdown for RFO #9, presently scheduled for April 3, 1993.