Attachment A

Proposed Technical Specification Change

Proposed Change

Reference is made to Pilgrim Nuclear Power Station Technical Specifications; Table of contents, Sections 3.6.D, 3.9.B and Administrative Section 6.

The following changes are requested to be made:

1) Table of Contents, pg. iii

   Change: "6.6 Reportable Occurrence Action"

   To: "6.6 Reportable Event Action"

2) Section 3.6.D.3, pg. 126

   Delete "and a Report shall be issued per T.S. Section 6.9.B.1 which shall address the actions that have been taken or a schedule of actions to be taken."

3) Section 3.9.B.1, pg. 196

   Delete "At the end of this period, provided the second source of incoming power has not been made immediately available, the AEC must be notified of the event and the plan to restore this second source."

4) Section 3.9.B.2, pg. 196

   change "and the AEC is notified within 24 hours of the situation, the precaution to be taken during this period and the plans for prompt restoration of incoming power."

   to: "and the NRC is notified within one (1) hour as required by 10CFR50.72."

5) Section 3.9.B.4, pg. 197

   Delete "and the AEC is notified within 24 hours of the occurrence of the inoperable components."

6) Section 3.9.B.5, pg. 197

   Delete "The AEC shall be notified within 24 hours of the situation, the precautions to be taken during this period and the plans to return the failed component to an operable state."

7) Section 6.2, pg. 208

add Paragraph C. as follows:

C. <u>Changes to the Organization</u>

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."

8) Section 6.5.B.7.g, pg. 215

Change: "All events which are required by regulation or Technical Specifications to be reported to the NRC in writing within 24 hours."

To: All events which are required by 10CFR50.73 to be reported to the NRC in writing.

9) Section 6.6, pg. 216

Change: "Reportable Occurrence Action"

To: "Reportable Event Action"

Change: "The following actions shall be taken in the event of a reportable occurrence."

To: "The following actions shall be taken for each reportable event"

Change: "A. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9."

To: "A. The Commission shall be notified and/or a report submitted pursuant to the requirements of either 10CFR50.72 or 10CFR50.73."

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

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

10) Section 6.7, pg. 216

Change: "B. The Safety Limit Violation shall be reported to the Commission, the Station Manager, and to the NSRAC Chairman immediately."

To: "B. The Safety Limit Violation shall be reported to the Commission within one hour per 10CFR 50.36(c)(6) and 50.72, and to the Station Manager and NSRAC Chairman immediately."

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

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

11) Section 6.9.B. pgs. 220, 221, 222.

Delete the entire section from these pages.

12) Section 6.10.A. pg 224

Change: "3. Reportable Occurrence Reports."

To: "3. Reportable Event Reports."

Reason for Change

These changes are being requested to comply with the requirements of the referenced Generic Letter (No. 83-43).

The referenced letter enclosed model Technical Specifications in Standard Technical Specification (STS) format which showed the revisions to be made to conform to regulation changes. PNPS has custom Technical Specifications and therefore, the changes provided for STS cannot be used verbatim but have been used as guidelines for the above listed Technical Specification revisions.

Safety Considerations

The proposed changes are in conformance with the reference document (Generic Letter No. 83-43) and the model Technical Specifications provided in that document. They do not present an unreviewed safety question as defined in 10CFR50.59.

These changes have been reviewed by the Nuclear Safety Review and Audit Committee (NSRAC) and have been reviewed and approved by the Operations Review Committee.

Significant Hazards Considerations

It has been determined that this amendment request involves no significant hazards consideration. Under the NRC's regulations in 10 CFR 50.92, this means that operation of the Pilgrim Nuclear Power Station in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The NRC has provided guidance concerning the application of standards for determining whether license amendments involve significant hazards considerations by providing certain examples (48 FR 14870). One example of an amendment that is considered not likely to involve a significant hazards consideration is "...(vii) A change to make a license conform to changes in the regulations where the license change results in very minor changes to facility operations clearly in keeping with the regulations". Since the proposed changes are being made to make the PNPS Technical Specifications conform to 10CFR50.73(g) the referenced example applies to these changes.

Schedule for Change

Boston Edison Company proposes that these changes be effective upon receipt by the NRC.

Attachment B

Proposed Technical Specification Change

List of pages affected by this change:

iii, 126, 196, 197, 208, 208a, 215, 216, 220, 221, 222, 224

LIMITING CONDITION FOR OPERATION

3.6.C Coolant Chemistry (Cont'd)

power operation is permissible only during the succeeding seven days.

3 If the conditions in 1 or 2 above cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a Cold Shutdown Condition within 24 hours

D. Safety and Relief Vavles

1. During reactor power operating conditions and prior to reactor startup from a Cold Condition, or whenever reactor coolant pressure is greater than 104 psig and temperature greater than 340°F, both safety valves and the safety modes of all relief valves shall be operable.

2. If Specification 3.D.1 is not met, an orderly shutdown shall be initiated and the reactor coolant pressure shall be below 104 psig within 24 hours. Note: Technical Specifications 3.6.D.2 - 3.6.D.5 apply only when two Stage Target Rock SRVs are installed.

3. If the temperature of any safety relief discharge pipe exceeds 212°F during normal reactor power operation for a period of greater than 24 hours, an engineering evaluation shall be performed justifying continued operation for the corresponding temp. increases.

4. Any safety relief valve whose discharge pipe temperature exceeds 212°F for 24 hours or more shall be removed at the next cold shutdown of 72 hours or more, tested in the as-found condition, and recalibrated as necessary prior to reinstallation. Power operation shall not continue beyond 90 days

SURVEILLANCE REQUIREMENTS

4.6

D. Safety and Relief Valves

1. At least one safety valve and two relief/safety valves shall be checked or replaced with bench checked valves once per operating cycle. All valves will be tested every two cycles.

   The set point of the safety valves shall be as specified in Specification 2.2.

2. At least one of the relief/safety valves shall be disassembled and inspected each refueling outage.

3. Whenever the safety relief valves are required to be operable, the discharge pipe temperature of each safety relief valve shall be logged daily.

4. Instrumentation shall be calibrated and checked as indicated in Table 4.2.F.

5. Notwithstanding the above, as a minimum, safety relief valves that have been in service shall be tested in the as-found condition during both Cycle 6 and Cycle 7.

3.9.B Operation with Inoperable Equipment (Cont'd)

reactor operation is permissible under this condition for seven days. During this period, both diesel generators and associated emergency buses must be demonstrated to be operable.

2. From and after the date that incoming power is not available from both startup and shutdown transformers, continued operation is permissible, provided both diesel generators and associated emergency buses are demonstrated to be operable, all core and containment cooling systems are operable, reactor power level is reduced to 25% of design and the NRC is notified within one (1) hour as required by 10CFR50.72.

3. From and after the date that one of the diesel generators or associated emergency bus is made or found to be inoperable for any reason, continued reactor operation is permissible in accordance with Specification 3.5.F if Specification 3.9.A.1 and 3.9.A.2.a are satisfied.

4. From and after the date that one of the diesel generators or associated emergency buses and either the shutdown or startup transformer power source are made or found to be inoperable for any reason, continued reactor operation is permissible in accordance with Specification 3.5.F, provided either of the

3.9.B Operation with Inoperable Equipment

following conditions are satisifed:

a. The startup transformer and both offsite 345 kV transmission lines are available and capable of automatically supplying auxiliary power to the emergency 4160 volt buses.

b. A transmission line and associated shutdown transformer are available and capable of automatically supplying auxiliary power to the emergency 4160 volt buses.

5. From and after the date that one of the 125 or 250 volt battery systems is made or found to be inoperable for any reason, continued reactor operation is permissible during the succeeding three days within electrical safety considerations, provided repair work is initiated in the most expeditious manner to return the failed component to an operable state, and Specification 3.5.F is satisfied.

6. With the emergency bus voltage less that 3950 but above 3745 (excluding transients) during normal operation, transfer the safety related buses to the diesel generators. If grid voltage continues to degrade be in at least Hot Shutdown within the next 4 hours and in Cold Shutdown within the following 12 hours unless the grid conditions improve.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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.

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.

g. All events which are required by 10CFR50.73 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 by 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 deficiences 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 Station 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 10CFR50.72 or 10CFR50.73.

B. Each Reportable Event Report submitted to the Commission shall be reviewed by the ORC and submitted to the NSRAC Chairman and the Station 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 Station 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 Station 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 ORC Chairman prior to implementation. These procedures shall be reviewed periodically as set forth in administrative procedures.

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3. Special Reports

Special reports shall be submitted as indicated in Table 6.9.1.

6.10 RECORD RETENTION

A. The following records shall be retained for at least five years:

1. Records of facility operation covering time interval at each power level.

2. Records of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.

3. Reportable Event Reports.

4. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.

5. Records of reactor tests and experiments.

6. Records of changes made to Operating Procedures.

7. Records of radioactive shipments.

8. Records of sealed source leak tests and results.

9. Records of annual physical inventory of all source material of record.

B. The following records shall be retained for the duration of the Operating License:

1. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.

2. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

3. Records of facility radiation and contamination surveys.

4. Records of radiation exposure for all individuals entering radiation control areas.

5. Records of the service lives of all hydraulic and mechanical snubbers listed on Tables 3.6.I(a) and 3.6.I(b) including the date at which the service life commences and associated installation and maintenence records.