

BOSTON EDISON COMPANY
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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

November 1, 1984

BECO Ltr. #84-187

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 No. DPR-35
Docket No. 50-293

Generic Letter 82-33: Regulatory Guide 1.97

Dear Sir:

By letter dated December 17, 1982, the NRC issued Generic Letter 82-33, which transmitted enclosures associated with post-TMI issues. The enclosures were a distillation of the basic requirements gleaned from a broad range of guidance documents issued by the NRC.

A requirement to address the concerns of Regulatory Guide (R.G.) 1.97 Rev. 2, was included as part of GL 82-33. RG 1.97 was issued to describe an acceptable method to comply with the regulations to provide instrumentation to monitor plant variables and system parameters during and following an accident.

By letter of October 26, 1983, Boston Edison committed to supply a report on how Pilgrim currently met the requirements and how it would meet the requirements in cases where it did not. Attached to this letter is a report, Regulatory Guide 1.97 Compliance Evaluation for Pilgrim Nuclear Power Station which fulfills that commitment. This report addresses Rev. 3 of R.G. 1.97.

In cases where deviations have been identified, either justification has been provided or a modification will take place. The conclusion of these modifications is expected to coincide with restarting from refueling outage #8.

In addition to the modifications listed in the enclosed report, Boston Edison will meet the requirements of Sections 6.1.c and 6.1.d of GL 82-33 by providing the required access to 1.97 variables on our SPDS displays in the TSC and EOF.

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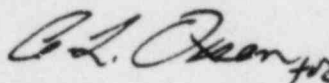
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We believe this report and the commitment to upgrade instrumentation which significantly deviates from RG 1.97 guidance fulfills our commitment of October 26, 1983. Should you wish further information concerning this issue, please do not hesitate to contact us.

Sincerely,



William D. Harrington

WDH/ko

Attachment: Regulatory Guide 1.97 Compliance
Evaluation for Pilgrim Nuclear
Power Station I