



**Boston Edison**

Pilgrim Nuclear Power Station  
Rocky Hill Road  
Plymouth, Massachusetts 02360

**E. T. Boulette, PhD**  
Senior Vice President - Nuclear

May 1, 1996  
BECo Ltr. #96-046

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

Docket No. 50-293  
License No. DPR-35

Proposed Technical Specification Changes

In accordance with the requirements of 10 CFR 50.90, Boston Edison Company proposes a change to the Pilgrim Station Technical Specifications.

The change consists of relocating the administrative controls related to the quality assurance review and audit requirements of Section 6 from the Pilgrim Station Technical Specifications to the Boston Edison Quality Assurance Manual. This change is submitted in accordance with the guidance contained in NRC Administrative Letter 95-06: "Relocation of Technical Specification Administrative Controls Related to Quality Assurance".

Administrative Letter 95-06 also presents acceptable strategies for revising certain audit frequencies by implementation of a performance-based schedule provided that the maximum audit interval does not exceed the 2 year interval specified in ANSI N18.7. This proposed change follows the Administrative Letter guidance and relocates the existing technical specifications into the Boston Edison Quality Assurance Manual and at the same time makes changes to certain audit frequency intervals in accordance with 10 CFR 50.54(a). Therefore, the proposed Boston Edison Quality Assurance Manual change pages already reflect the 50.54(a) changes with the revised audit frequency intervals.

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The description of the proposed change is included as attachment A. Attachment B contains the amended technical specification page. Attachment C contains a marked-up technical specification page. Attachment D provides a description of changes to the Boston Edison Quality Assurance Manual (BEQAM). Attachment E provides amended BEQAM pages. Attachment F provides marked-up BEQAM pages.

*E. T. Boulette*

E. T. Boulette, PhD

Commonwealth of Massachusetts)  
County of Plymouth )

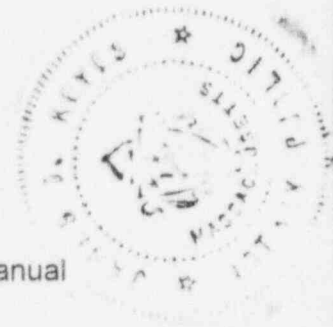
Then personally appeared before me, E. T. Boulette, who being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My commission expires:

March 25, 1999  
DATE

James D. Keys  
NOTARY PUBLIC

Attachment A:	Description of Proposed Change
Attachment B:	Amended Technical Specification Page
Attachment C:	Marked-up Technical Specification Page
Attachment D:	Description of Changes to the Boston Edison Quality Assurance Manual
Attachment E:	Amended Boston Edison Quality Assurance Manual Pages
Attachment F:	Marked-up Boston Edison Quality Assurance Manual Pages



Original plus 37 copies

cc: Mr. Alan B. Wang, Project Manager  
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U.S. Nuclear Regulatory Commission  
Region I

Attachment A  
Description of Proposed Change

Proposed Change :

Reference is made to Pilgrim Station Technical Specification Section 6.0, Administrative Controls. The audits specified under 6.5.B.8 are being deleted. Instead, these audits will be included in the Boston Edison Quality Assurance Manual.

Discussion:

NRC Administrative Letter (AL) 95-06 informed licensees of recent experiences involving the relocation of Technical Specification (TS) administrative controls related to quality assurance. The AL provides guidance related to the relocation of review and audit requirements from the TS to the quality assurance plan. The AL also presents acceptable strategies for revising certain audit frequencies by implementation of a performance-based schedule provided that the maximum audit interval does not exceed the 2 year interval specified in ANSI N18.7. Our proposed change follows the AL guidance and relocates the existing technical specifications into the Boston Edison Quality Assurance Manual (BEQAM) and at the same time makes changes to certain audit frequency intervals in accordance with 10 CFR 50.54(a). Therefore, the proposed BEQAM change pages included as Attachment E already reflect the 50.54(a) changes with the revised audit frequency intervals.

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Code of Federal Regulations (10 CFR 50.91) requires licensees requesting an amendment to provide an analysis, using the standards in 10 CFR 50.92, that determines whether a significant hazards consideration exists. The following analysis is provided in accordance with 10 CFR 50.91 and 10 CFR 50.92 for the proposed amendment.

- (a) The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The change will relocate the administrative controls related to the quality assurance review and audit requirements from the technical specifications to the quality assurance plan. These changes are administrative in nature and do not impact initiators of analyzed events, accident mitigation capabilities, or transient events. The quality assurance program is a logical candidate for such relocation due to the controls imposed by such regulations as Appendix B to 10 CFR 50, the existence of NRC approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a). Therefore, the changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (b) The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The change will relocate the administrative controls related to the quality assurance review and audit requirements from the technical specifications to the quality assurance plan. The quality assurance program is a logical candidate for such relocation due to the controls imposed by such regulations as Appendix B to 10 CFR 50, the existence of NRC approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a). The proposed changes do not involve a physical alteration of the plant or changes in methods governing plant operation. The changes will not impose or eliminate any new or different requirements. Therefore the changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (c) The proposed amendment does not involve a significant reduction in a margin of safety.

The change will relocate the administrative controls related to the quality assurance review and audit requirements from the technical specifications to the quality assurance plan. These changes are administrative in nature. The quality assurance program is a logical candidate for such relocation due to the controls imposed by such regulations as Appendix B to 10 CFR 50, the existence of NRC approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a). The proposed change will not reduce a margin of safety because it has no impact on any safety analysis assumptions. Therefore, the operation of PNPS in accordance with the proposed license amendment will not involve a significant reduction in a margin of safety.

The proposed change has been reviewed and approved by the Operations Review Committee and reviewed by the Nuclear Safety Review and Audit Committee.

We request NRC approval of the proposed TS change no later than August 1996, with an implementation date effective within 30 days of approval.