

**BOSTON EDISON COMPANY**  
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

December 12, 1984  
BECo Ltr. #84-209

Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docket Number 50-293  
License DPR-35

Request For Scheduling Relief  
Post-Accident Sampling and Post-Accident Monitoring Systems

Dear Sir:

In accordance with 10CFR50.91(5), Boston Edison Company (BECo) hereby requests an extension for completion of work associated with certain post TMI-related items set forth in NUREG-0737, "Clarification of TMI Action Plan Requirements." Our proposed schedule commitment is June 30, 1985 for completion of work activities for the installation of an upgraded Post-Accident Sampling System (PASS) and installation of a Containment Atmospheric Continuous Monitoring System (H<sub>2</sub>O<sub>2</sub>).

Background

Installation of the PASS and H<sub>2</sub>O<sub>2</sub> systems is currently scheduled for completion concurrent with the end of Refuel Outage No. 6. This schedule has been established by NRC Order (Order), dated June 15, 1984, and more recently identified as a Schedule A item in the NRC-approved (Amendment No. 75) Long-Term Program (LTP).

Work on both of these systems was completed as of August 1984, with the exception of startup testing. As discussed in the Order, this testing could not be completed without repressurizing the reactor; therefore, remaining work activities for these systems were scheduled for completion just prior to startup.

During the course of final testing in December 1984, cracks were discovered in two, one-inch sample lines common to both PASS and H<sub>2</sub>O<sub>2</sub> systems. We believe the cause of these cracks to be chloride assisted stress corrosion cracking and are investigating the cause of chloride intrusion. Our preliminary investigation results indicate that the residual chlorides were generated during post-construction hydrostatic testing and subsequent flushing and drying of the affected lines. This process apparently caused remaining water in the lines to evaporate thus leaving a chloride enriched residue in the pipes.

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In the interim, we have developed immediate corrective action plans to determine the extent of this problem and to repair and/or modify the PASS and H<sub>2</sub>O<sub>2</sub> sample lines. These plans are being implemented at this time, and we believe there will be an impact on the deadline for completion.

### Schedule

Our current assessment of the schedule required for completion of repairs and testing for the PASS and H<sub>2</sub>O<sub>2</sub> systems is June 30, 1985. This date represents the case that similar conditions will be discovered in the other 4 sample lines. In the event of favorable investigation results, we expect to be able to complete the required actions at an earlier date. It should be noted that our plans can be implemented during reactor operation. Our objective for the development of this schedule is to minimize replacement activities in conjunction with correction of the problem. Both inspection and repair activities will be hampered by the physical location of the affected piping and installation of heat tracing and insulation.

### Justification For Immediate Relief

Because of the tight schedule constraints for completion of system testing, which resulted in this recent discovery of cracks, we believe this request for extension is timely and could not have been submitted at an earlier date. Also, in accordance with the procedural stipulation of the LTP, rescheduling of this Schedule A item could not be avoided by the rescheduling of other Schedule A or Schedule B items.

Mr. Robert M. Hallisey, Director, Radiation Control Program, Massachusetts Department of Public Health, was contacted and apprised of this request on December 11, 1984.

### Safety Considerations

Continued safe operation of Pilgrim Station is assured because the ability to monitor the primary containment via sampling capabilities in both the drywell and torus remain available. Thus the technical specification requirements for operable hydrogen analyzers will be satisfied and the ability to monitor representative oxygen concentrations will be available. The H<sub>2</sub>O<sub>2</sub> analyzers and the containment high radiation monitors provide adequate information for monitoring the conditions inside primary containment to assess the existence of core damage following an accident. This provides a level of safety consistent with previous operating cycles and therefore does not reduce the margin of safety.

In addition, we intend to place unaffected portions of the PASS and H<sub>2</sub>O<sub>2</sub> systems into service at startup. This would include for PASS, the capability to obtain liquid samples from all liquid sample points and the capability to obtain atmospheric samples from one drywell and one torus sample point. For H<sub>2</sub>O<sub>2</sub>, it would include one complete and functional safety train in the torus and both trains in the drywell.

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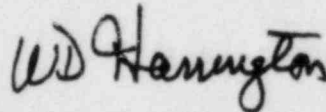
In summary, although it is expected that only the redundant torus atmosphere sampling capabilities for the H<sub>2</sub>O<sub>2</sub> system will be unavailable at startup, we are requesting schedular relief in the event that our investigation findings dictate more extensive repair/replacement work. Replacement activities have commenced and replacement work will be considerably reduced before startup.

This request does not involve a significant hazards consideration as it does 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 above information should be sufficient for you to act on our request for schedular relief. We request this relief be granted to support a startup date of December 17, 1984. Should you determine that additional information is necessary, please do not hesitate to contact me.

Very truly yours,



W. D. Harrington

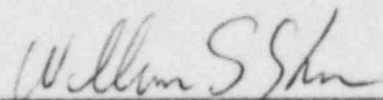
Commonwealth of Massachusetts)  
County of Suffolk )

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

My Commission expires:

June 22, 1990

cc: See next page

  
Notary Public

WILLIAM S. STOWE, NOTARY PUBLIC  
COMMISSION EXPIRES JUNE 22, 1990

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cc: Dr. Thomas E. Murley, Regional Administrator  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Region I - 631 Park Avenue  
King of Prussia, PA 19406

R. C. DeYoung, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Resident Inspector