UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 15, 1992

Docket No. 50-293

Mr. Roy A. Anderson
Senior Vice President - Nuclear
Boston Edison Company
Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

Dear Mr. Anderson:

SUBJECT: PILGRIM NUCLEAR POWER STATION, INSERVICE TEST PROGRAM FOR THIRD 10-YEAR INTERVAL (TAC NO. M85069)

Boston Edison Company submitted the updated inservice testing program for the Pilgrim Nuclear Power Station in their letter dated November 25, 1992, in accordance with 10 CFR 50.55a. The third ten-year inservice testing interval began December 10, 1992. The licensee has scheduled refueling outage (RFO) #9 for April 1993 and has requested interim staff approval of the inservice testing program relief requests until the staff review and evaluation is complete. Particularly, the following items were listed for a "priority" review:

Cold Shutdown Justification CSJ 17 - The staff does not evaluate cold shutdown justifications in Safety Evaluations. However, deferring testing of main steam isolation valves full-stroke exercising from power operations to cold shutdown appears to be justified. This item will be subject to NRC inspection.

Relief Request RV-25 - High pressure coolant injection system exhaust drain pot isolation solenoid operated valves cannot currently be stroke-timed. NRC previously granted interim relief until the third ten-year interval. A modification scheduled for RFO#9 (April 1993) will replace these valves with valves that can be tested in accordance with the Code requirements. It is acceptable to the staff to begin stroke-time testing of these valves subsequent to replacement. The Safety Evaluation will consider that the replacement is to be complete prior to startup from the April 1993 refueling outage.

Relief Request RV-37 - This request is to allow closure verification of various check valves to be performed every two years by leakage testing. The staff will review each specific case and may require more frequent testing, depending on the impracticality of performing leakage testing during power operations or cold shutdown conditions. The licensee should ensure that all of the applicable valves are leakage tested during the April 1993 refueling outage for the interim until the staff issues the Safety Evaluation.

Relief Request RV-38 - Pump discharge check valves will be tested on a frequency established for full-flow testing of the respective pumps in the

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reactor building closed cooling water and salt ser
exceed a refueling interval frequency. The licens
valves are tested during the April 1993 refueling
the staff issues the Safety Evaluation.

Relief Request RV-39 - The licensee proposes to follow
Technical Specifications for mode changes. When valves teste
shutdown frequency fail to meet the acceptance criteria, plant sta
proceed if the valve is not required to be operable. The staff finds
acceptable on an interim basis for valves in systems included in Technical Specifications. For the remaining valves, a determination that the affected system operability is not required for mode changes must be performed for each particular valve. This will be further addressed in the staff's Safety Evaluation.

Relief Request RV-40 - The licensee proposes to test the main steam isolation and safety relief valve pilot assemblies using a slave main valve body. The proposal is acceptable for any testing performed prior to receipt of the staff's Safety Evaluation provided the licensee ensures that adequate quality controls exist for reinstallation of the pilot assemblies following testing. This will be further discussed in the staff's Safety Evaluation.

Relief Request RV-41 - For the residual heat removal system check valves 68A/B, the testing will be staggered on a cold shutdown testing frequency, not to exceed testing both valves on at least a refueling outage basis. The testing of both valves on a cold shutdown frequency requires operation of both loops and swapping the shutdown cooling function. This creates a "higher risk evolution" and a potential loss of shutdown cooling. The proposal is acceptable until the staff performs a detailed evaluation of this request.

The remaining relief requests appear to be consistent with the previous 10-year interval program, or have been revised to address concerns identified in NRC Safety Evaluation, Revision 1, dated February 3, 1992. The staff projects that the Safety Evaluation for the third 10-year interval will be issued by June 1, 1993. The new program should be implemented in the interim period in accordance with the revised requirements.

Sincerely,

Ronald B. Eaton, Senior Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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Relief Request RV-39 - The licensee proposes to follow the requirements of Technical Specifications for mode changes. When valves tested on a cold shutdown frequency fail to meet the acceptance criteria, plant startup will proceed if the valve is not required to be operable. The staff finds this acceptable on an interim basis for valves in systems included in Technical Specifications. For the remaining valves, a determination that the affected system operability is not required for mode changes must be performed for each particular valve. This will be further addressed in the staff's Safety Evaluation.

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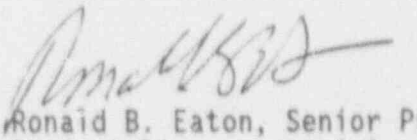

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