

BOSTON EDISON COMPANY  
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

June 18, 1985

BECO 85-113  
Proposed Change 85-07

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 DPR-35  
Docket 50-293

Proposed Technical Specification Change  
2/3 Core Height

Dear Sir:

Pursuant to 10CFR50.90, Boston Edison Company hereby proposes the attached modification to Appendix A of Operating License No. DPR-35. This modification will clarify the 2/3 core height setting. The present setting listed in the Technical Specifications has been determined to be inconsistent with the actual 2/3 core height. In accordance with 10CFR170.22, a check in the amount of one hundred and fifty dollars (\$150.00), for an amendment initiation fee, is enclosed with this letter.

Please contact us if any further information is required

Very truly yours,

*W D Harrington*

GGW/kmc

Attachment  
3 signed originals and 37 copies

cc: See next page

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: *October 21, 1988*

*Peter M. Kahler*  
Notary Public

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PDR ADDCK 05000293  
PDR

*Acc'd w/ check  
3/10 1150.00  
# 898402*

BOSTON EDISON COMPANY

Mr. Domenic B. Vassallo, Chief  
June 18, 1985  
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cc: Mr. Robert M. Hallisey, Director  
Radiation Control Program  
Massachusetts Dept. of Public Health  
150 Tremont Street F-7  
Boston, MA 02111

## Attachment A

### Proposed Technical Specification Change 2/3 Core Height Setting

#### Proposed Change

The proposed change involves Pilgrim Nuclear Power Station Technical Specifications, Appendix A, Table 3.2.B, Instrumentation that Initiates or Controls the Core and Containment Cooling Systems. The entire change consists of replacing the number "302" with the correct number "307" for the Trip Level Setting, and the addition of the word "approximately" before the notation "2/3 core height." The attached Technical Specification page for Table 3.2.B includes the proposed change.

#### Reason for Change

An inconsistency exists between the present Technical Specification reference for the Reactor Low Level (inside shroud) trip level setting of 302 inches above vessel zero and the FSAR reference of 2/3 core height. This proposed change would correct this inconsistency.

The purpose of the setpoint is to prevent inadvertent operation of the containment spray when the RHR system is needed in the LPCI mode to maintain water level in the core. Either 302 inches above vessel zero or 2/3 core height (307 inches) as a minimum setpoint fulfills the intent of the interlock.

This inconsistency is the subject of an inspection open item identified in I&E Inspection 84-26 (11/21/84) as item 84-26-02. This change will also help to close out this open item.

#### Safety Considerations

This change does not involve an unreviewed safety question as defined in 10CFR50.59. It has been reviewed and approved by the Operations Review Committee and reviewed by the Nuclear Safety Review and Audit Committee.

#### Significant Hazards Considerations

It has been determined that the amendment request involves no significant hazards consideration. Under the NRC's regulations in 10CFR50.92, 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 "... (i) A purely administrative change to Technical Specifications for example, a change to achieve consistency throughout the

Technical Specifications, correction of an error, or a change in nomenclature." Since this proposed change is being requested to correct an inconsistency, the change clearly fits the example.

Schedule of Change

This change will be put into effect within 30 days upon receipt of approval by the NRC.