BOSTON EDISON COMPANY
GENERAL OFFICES 800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

G. CARL ANDOGNINI
MANAGER
NUCLEAR OPERATIONS DEPARTMENT

November 2, 1978

BECo. Ltr. #78-186

Mr. Thomas A. Ippolito, Chief
Operating Reactors Branch #3
Division of Operating Reactors
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

Supplementary Information to
Proposed License Amendment

References: a.) USNRC letter to Boston Edison Company, Docket No. 50-293, dated January 24, 1975.

b.) Boston Edison Company letter to USNRC application for License Amendment, dated October 16, 1978.

c.) USNRC letter to Boston Edison Company, Amendment No. 33, dated August 17, 1978.

Dear Sir:

On October 16, 1978, Boston Edison Company submitted an application for an Amendment to Operating License No. DPR-35. The amendments consisted of changes in those portions of the license pertaining to the receipt, possession, and use of byproduct source and special nuclear materials. To further clarify the intent of that submittal, the following supplementary information is offered in accordance with Reference a.).

As indicated in Reference b.), Boston Edison Company's existing license specifies quantity limits in Sections 2. (b), (c), (d), which authorize the receipt, possession and use of byproduct source and special nuclear material. Specifically, Section 2. (b) limits station special nuclear material possession to 4100 kilograms of U-235, in connection with the operation of the facility. This limitation will necessitate a number of licensing actions in the future as a result of fuel purchase for refueling, and subsequent spent fuel addition to the spent fuel storage pool, which now has a greater storage capacity per Reference c.).

7811140132 A001 S 1/1 ADD NMSS w/ENCL

In addition, Boston Edison Company's current license Section 2. (c), which specifies quantity limits for possession of source materials, now prevents Pilgrim Station from purchasing an additional sealed source of C_s 137 in the amount of 170 Ci, for instrument calibration purposes.

Therefore, the more generalized provisions as proposed in Reference b.) would reduce the number of required licensing actions as warranted by current possession and use limits, and preclude the possibility of future delays.

Enclosed is a revision to our FSAR updating the source inventory in accordance with Regulatory Guide 1.70.3.

Should there be any further questions or concerns, please contact us.

Very truly yours,

Attachment: Proposed FSAR Revision

Table 12.4.1

Required Source, Byproduct, and Special Nuclear Materials

	Material	Form and Use	Possession Limit	
A.	Any byproduct source, and special nuclear material	As reactor fuel; as sealed neutron sources for reactor startup; as sealed sources for calibration of reactor instruments and radiation monitoring equipment; and as fission detectors.	Amount required for reactor operation or stored from past operation or for future operation.	
B.	Any byproduct material	Any form for sample analysis or instrument calibration or associated with radioactively contaminated apparatus.	100 millicuries each isotope	
C.	Any source or special nuclear material	Any form for sample analysis or instrument calibration or associated with radioactivity.	100 milligrams each isotope.	37
D.	Cesium-137	Sealed Sources	270 Curies	Rev. 1
E.	Americium-241	Americium-Beryllium sealed sources	6.0 Curies	
F.	Antimony-125	Antimony-Beryllium sealed sources	14,000 Curies	
G.	Hydrogen-3	Titanium Tritide Foil	255 millicuries	
H.	Mixed Corrosion Products (Co-60, Co-58, Fe-59, Cr-51, Mn-54, Sb-124, Nb-95, Nb-95M, Zr-95, Ag-110M, Zn-65)	Fixed *upon surface and/or contained within reactor equipment.	Total activity of mixed corrosion products not to exceed 3 curies.	40

*Removable surface contamination on all external surfaces shall not exceed 2,200 beta gamma disintegrations/minute per 100 cm^2.