10CFR50.90

BOSTON EDISON
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Ralph G. Bird
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BECo 88-014
Proposed Change 88-01

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

January 25, 1988

License DPR-35
Docket 50-293

PROPOSED TECHNICAL SPECIFICATION
CHANGE CONCERNING APRM DOWNSCALE SCRAM

Dear Sir:

Pursuant to 10CFR50.90, the Boston Edison Company proposes the attached amendment to Appendix A of Operating License DPR-35. This proposed amendment is an administrative change to the Pilgrim Nuclear Power Station (PNPS) Technical Specifications to remove misleading references to an average power range monitor (APRM) downscale scram function.

In accordance with 10CFR170.12(c), the application fee of one hundred and fifty dollars ($150.00) will be electronically transferred to your offices.

R. G. Bird

DMV/jcp/1189

One original and 37 copies

Attachment: Proposed Technical Specification Change Description Concerning APRM Downscale Scram

cc: See next page

Commonwealth of Massachusetts)
County of Suffolk)

Then personally appeared before me, Ralph G. Bird, 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.

Gerald C. Whitney
Notary Public
My Commission Expires April 3, 1992

My commission expires: DATE NOTARY PUBLIC

A001
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cc: Mr. D. G. McDonald, Project Manager
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Attachment to BECo Letter 88-014

Proposed Technical Specification Change
Description Concerning APRM Downscale Scram

Proposed Changes

It is proposed that PNPS Technical Specification Pages 27, 29, and 30 be revised as shown on the attached pages and described below:

1. Technical Specification Table 3.1.1, Reactor Protection System (Scram) Instrumentation Requirement, is to be revised to delete the requirement for an APRM downscale scram.

2. Associated Footnotes 11 and 12 for Technical Specification Table 3.1.1 are to be deleted to remove references to an APRM downscale trip.

3. Technical Specification Table 4.1.1, Reactor Protection System (Scram) Instrumentation Functional Tests, is to be revised to delete the functional testing requirement for an APRM downscale scram.

Reason for Changes

References to an APRM downscale scram are to be removed from PNPS Technical Specifications because this feature is not actually a scram function of the reactor protection system (RPS). As shown on the simplified RPS circuit diagram on attached Figure 1, the APRM downscale contact only acts to bypass the intermediate range monitor (IRM) scram trips when the reactor is in the run mode and the APRMs are not downscale. Furthermore, once the IRM detectors are removed from the core in the run mode, the IRM Hi Hi and IRM Inop contacts remain closed. If in this situation an APRM downscale condition occurs, it can be seen from Figure 1 that no scram trip would result. In summary, because the APRM downscale contact only acts to provide a bypass of the IRM scram trips in run mode when the APRMs are not downscale, it is inappropriate and misleading to include APRM downscale in the Technical Specification tables of required RPS scram functions.

A complete description of the function of the APRM downscale contact in the RPS is currently provided in Footnote 5 of Technical Specification Table 3.1.1. This footnote states that "IRM's are bypassed when APRM's are onscale and the reactor mode switch is in the run position." This is an accurate description of the function of the APRM downscale contact and shall remain in Technical Specifications.

This proposed administrative change will add to the clarity and understanding of the Technical Specifications by removing misleading statements that imply that an APRM downscale condition in run mode will result in a scram trip. In fact, an APRM downscale condition in run mode only results in a removal of the bypass of the IRM scram trips.

As required by existing Technical Specification Table 4.1.1, the APRM downscale feature of the RPS is currently functionally tested to a half-scram condition on a weekly basis when in the run mode. This administrative Technical Specification change would remove the requirement for this half-scram testing and make the plant less susceptible to spurious trips and inadvertent initiation of safeguards equipment.

This proposed change clarifies existing Technical Specifications and will not impact the configuration of any plant systems, operating procedures, or the original safety analysis.

Safety Evaluation and Determination of No Significant Hazards Considerations

In accordance with 10CFR50.91, the following analysis has been performed using the standards in 10CFR50.92, concerning the issue of significant hazards considerations.

1. Operation of PNPS in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed changes would clarify the intent of the original Technical Specifications by clearly defining the scram functions needed to be operable in each mode of operation. The allowable bypasses assure that the single failure criteria are satisfied for the required scram functions of the IRMs and APRMs. The proposed changes do not involve modifications to the RPS wiring or circuitry thus, by design, overlap between the IRMs and APRMs is assured. The removal of the Technical Specification requirement for weekly testing of the APRM downscale contact to a half-scram is justified because this contact provides no RPS safety function considered in the PNPS safety analysis. Therefore, the proposed changes will not involve a significant increase in the probability or consequences of any accident previously evaluated.

2. Operation of PNPS in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

   For the reasons stated in Item 1, above, the proposed change will not create the possibility of a new or different kind of accident.

3. Operation of PNPS in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

   Because the proposed change does not involve changes to the plant or associated analyses, this change will not involve a significant reduction in the margin of safety.

This modification to the PNPS Technical Specifications does not present 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.

Schedule of Change

It is requested that the proposed amendment become effective within 30 days of approval by the Commission.