



**BOSTON EDISON**

Pilgrim Nuclear Power Station  
Rocky Hill Road  
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**Ralph G. Bird**  
Senior Vice President — Nuclear

BECo Ltr. #88-140  
September 28, 1988

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

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

**SUBJECT: Pilgrim Nuclear Power Station**  
Readiness for Operation

Dear Sir:

This letter transmits the final results of Boston Edison's programs, plans, and actions to prepare Pilgrim Station for safe and reliable restart and continued operation. Through this letter, Boston Edison requests the Nuclear Regulatory Commission's agreement that Pilgrim is ready for restart.

Boston Edison has taken a careful and deliberate approach throughout the outage to prepare Pilgrim for the resumption of power operation. The Company has upgraded plant systems, expanded and improved its Nuclear Organization, and assisted the Commonwealth of Massachusetts in improving offsite emergency plans. Now, as Boston Edison prepares to begin operation, the same careful and deliberate approach is being applied to final operational readiness preparations and the Power Ascension Program.

During the course of the outage, Boston Edison has developed and implemented a voluntary Safety Enhancement Program. This program, which exceeds current regulatory requirements, consists of a set of improvements to Pilgrim systems, procedures and training which prevent, reduce the probability of, or further mitigate the consequences of postulated accidents. This program has been recognized by the NRC as an industry-leading initiative to enhance the safety of an operating nuclear plant.

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Boston Edison has also done extensive plant maintenance work during the outage, including substantial work on the Residual Heat Removal pumps, and the completion of thousands of work items on systems throughout Pilgrim Station to assure that the plant is in top physical condition.

Boston Edison expanded and improved its Nuclear Organization by recruiting top nuclear personnel from throughout the country which, when combined with the very capable long-term Boston Edison staff, has produced a strong and effective management team. The careful, sequenced transition to a permanent organizational structure is further evidence of the deliberate, cautious approach utilized throughout the outage.

Boston Edison has expended more than \$15 million to assist the Commonwealth of Massachusetts and local towns in improving their offsite emergency plans for Pilgrim Station. These expenditures have enabled and will enable the Commonwealth and towns to make substantial improvements in offsite emergency preparedness.

As Boston Edison moves into operational phases of Pilgrim restart, it will undertake a cautious, highly structured Power Ascension Program to bring Pilgrim Station to power over a period of approximately four months. This program will also confirm and demonstrate the readiness of the personnel and plant for continued safe and reliable power operation. There are five power levels in the Power Ascension Program at which NRC approval will be required to proceed to the next highest power level - 0%, 5%, 25%, 50%, and finally 75%. At each level, operator training and related assessments will be conducted. Boston Edison will provide an extra Senior Reactor Operator on each shift, and will have an experienced senior management oversight team in place. Operation at each power level will take as long as several weeks or more and ascension to the next level will not be permitted until the results of Boston Edison's assessment justify it and the NRC has approved it.

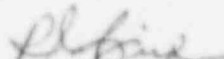
Completion of Pilgrim Restart Plan actions is documented in the enclosed Restart Plan, Volume 2, Rev. 3. The limited number of Restart Plan actions not yet closed are listed in Attachment 1 to this letter.

Actions in support of restart taken in response to the Restart Readiness Self-Assessment (RRSA) have been completed with a limited number of exceptions as documented in Attachment 2. Similarly, the actions in support of restart taken in response to the Integrated Assessment Team Inspection (IATI) have been completed with only a few exceptions as documented in Attachment 3. Finally, the physical work, including surveillance and precriticality testing, has been completed with the exception of the items listed in Attachment 4.

The schedule for completion of each outstanding item listed in Attachments 1 through 3 is set forth in the respective Attachments. Appendix 2, Volume 2, Revision 3 of the Restart Plan provides the schedule for completion of the outstanding items identified in Attachment 4.

The Boston Edison performance indicators, as reported in Appendix 5 to Volume 2, Revision 3 of the Restart Plan, indicate positive long term trends toward established goals, and with the limited exception of certain indicators relating to maintenance work backlog, show attainment of those goals at this time. As indicated on Attachment 5, Boston Edison actions will assure that the positive long term trends continue and that by October 14, 1988 these maintenance indicators will fall reasonably within the range of their respective goals.

Based upon implementation of its Restart Plan and the results of its Restart Readiness Self-Assessment, Boston Edison concludes that the necessary conditions for restart set forth in Confirmatory Action Letter 86-10 and the August, 1986 supplement thereto have been satisfied and that Pilgrim is ready to proceed into the Power Ascension Program. Accordingly, Boston Edison requests the Nuclear Regulatory Commission's agreement that Pilgrim is ready to restart.

  
R.G. Bird

Enclosure: Restart Plan, Volume 2, Rev. 3  
Attachments

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