

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Pilgrim Nuclear Power Station - Unit #1										DOCKET NUMBER (2) 0 5 0 0 0 2 9 3				PAGE (3) 1 OF 0 2	
TITLE (4) Primary Containment Local Leak Rate Test Frequency															
EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)					
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES				DOCKET NUMBER(S)		
0 6	1 3	8 6	8 6	0 1 5	0 0	0 7	1 4	8 6					0 5 0 0 0		
OPERATING MODE (9) N		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)													
POWER LEVEL (10) 0 0 0		20.402(b)				20.406(c)				50.73(a)(2)(iv)				73.71(b)	
		20.405(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(iv)				73.71(c)	
		20.405(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vii)				XX OTHER (Specify in Abstract below and in Text, NRC Form 365A)	
		20.405(a)(1)(iii)				50.73(a)(2)(i)				50.73(a)(2)(viii)(A)					
		20.405(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)					
		20.405(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(ix)					
LICENSEE CONTACT FOR THIS LER (12)															
NAME Brian Lunn - Plant Engineer										TELEPHONE NUMBER AREA CODE 6 1 7 7 4 6 - 7 9 0 0					
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)															
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC					
SUPPLEMENTAL REPORT EXPECTED (14)										EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR	
YES (If yes, complete EXPECTED SUBMISSION DATE)										X NO					

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On 6/13/86, with the plant in the cold shutdown condition, a review of Local Leak Rate Test (LLRT) completion dates from the previous shutdown period showed that greater than two years had elapsed since 69 Type B components and 39 Type C components had successfully passed LLRT. This was initially interpreted as exceeding the two year maximum interval between LLRTs as specified in 10CFR50 Appendix J. However, Boston Edison Company had previously applied the two year interval on a program basis. Using this method, LLRTs would not be required until 12/12/86. Also, compliance with the Pilgrim Nuclear Power Station (PNPS) Technical Specifications (T.S.) which requires LLRTs to be performed each operating cycle is maintained.

This report is submitted to describe the need for clarification of 10CFR50, Appendix J requirements. Our licensing department will be seeking formal clarification of this issue from the Office of Nuclear Reactor Regulation.

Prior to restart of the unit, LLRT will be successfully completed as well as the integrated leak rate test. This will ensure that compliance with the primary containment leak rate surveillance frequency requirements will be maintained.

8607210036 860714
PDR ADDCK 05000293
S PDR

IE22
1/1

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/85

FACILITY NAME (1) Pilgrim Nuclear Power Station Unit # 1	DOCKET NUMBER (2) 0 5 0 0 0 2 9 3 8 6 - 0 1 5 - 0 0 0 2 OF 0 2	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			

TEXT (If more space is required, use additional NRC Form 366A's) (17)

On 6/13/86, with the plant in the cold shutdown condition, an independent management review of individual local leak rate test (LLRT) completion dates was conducted. This information was to be considered in scheduling the postponed refuel outage. The review showed that greater than two years had elapsed since 69 of 101 Type B tests and 39 of 133 Type C tests had been successfully performed. This condition was initially interpreted as exceeding the two year maximum interval between LLRTs as specified in 10CFR50 Appendix J. However, Boston Edison Company had previously applied the two year interval on a program basis. This is because LLRT criteria are for both individual LLRTs and a composite of all LLRTs. The LLRT program would be considered complete, when the last test is complete and the composite criteria met. For the last refuel outage this occurred on 12/12/84. Therefore, on a programmatic basis LLRTs would not be required at Pilgrim Nuclear Power Station (PNPS) until 12/12/86.

This report is submitted to describe the need for clarification of 10CFR50 Appendix J requirements. Our licensing department will be seeking formal clarification of this issue from the Office of Nuclear Reactor Regulation by August 30, 1986.

PNPS Technical Specifications (T.S.), section 4.7.A.2.e, states that LLRTs are to be performed each operating cycle. Operating cycle is defined by the T.S. as the "interval between the end of one refueling outage and the end of the next subsequent refueling outage". Pilgrim was, and continues to be, in compliance with the testing interval of the Technical Specifications. Boston Edison Company has a pending Technical Specifications change request which, when issued, will modify the Technical Specifications to be consistent with 10CFR50 Appendix J requirements.

Prior to restart of the unit, LLRT will be successfully completed as will be the integrated leak rate test. This will ensure that compliance with primary containment leak rate surveillance frequency requirements will be maintained until the next refueling outage which is planned for early 1987.



BOSTON EDISON

Executive Offices
800 Boylston Street
Boston, Massachusetts 02199

July 14, 1986
BECO Ltr. #86-099

James M. Lydon
Chief Operating Officer

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

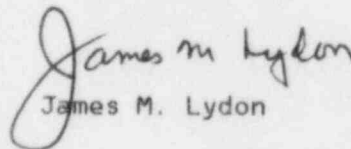
Docket No. 50-293
License No. DPR-35

Dear Sir:

The attached Licensee Event Report 86-015-00, "Primary Containment Local Leak Rate Test Frequency" is hereby submitted in accordance with the requirements of 10CFR50.73.

If there are any questions on this subject, please do not hesitate to contact me.

Respectfully submitted,


James M. Lydon

BL/ko

Enclosure: LER 86-015-00

cc: Dr. Thomas E. Murley
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Standard BECO LER Distribution

IE22
1/1