

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Pilgrim Nuclear Power Station - Unit No. 1	DOCKET NUMBER (2) 0 5 0 0 0 2 9 3	PAGE (3) 1 OF 0 2
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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 1	0 9	2 3	8 6			0 5 0 0 0
											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)			20.405(c)			50.73(a)(2)(iv)			73.71(b)		
	20.405(a)(1)(i)			50.38(c)(1)			50.73(a)(2)(v)			73.71(c)		
	20.405(a)(1)(ii)			50.38(c)(2)			50.73(a)(2)(vii)			X OTHER (Specify in Abstract below and in Text, NRC Form 366A)		
	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 NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		

SUPPLEMENTAL REPORT EXPECTED (14)							EXPECTED SUBMISSION DATE (15)		
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO							MONTH	DAY	YEAR

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 under the classification of "other" to describe the need for clarification of 10CFR50, Appendix J requirements. Our licensing department will be seeking clarification of this issue from the Office of Nuclear Reactor Regulation.

Prior to entering any condition where primary containment is required, both local and integrated leak rate testing will be successfully completed. Also, while clarification of this issue is pending, we will conduct our LLRT program to ensure that the interval between tests does not exceed two years for any primary containment isolation valve or penetration.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)  Pilgrim Nuclear Power Station Unit No. 1	DOCKET NUMBER (2)  0 5 0 0 0 2 9 3 8 6	LER NUMBER (5)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		86	015	01	02	OF 02

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 planning the rescheduled 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 (BECO) had previously applied the two year interval on a program basis. The LLRT program consists of the conduct and evaluation of "Type B Test" and "Type C Test" and is controlled by the Pilgrim Nuclear Power Station (PNPS) Procedures 8.7.1.5 (LLRT of Primary Containment Isolation Valves and Penetrations) and 8.7.1.6 (LLRT of the Main Steam Isolation Valves). Because LLRT criteria are for both individual LLRTs and a composite of all LLRTs, the LLRT program would be considered complete when the requirements of PNPS Procedure 8.7.1.5 and 8.7.1.6 have been satisfied. This is when the last test is complete and the composite criteria met. For the last refuel outage this occurred on 12/12/84. Therefore, applying the two year interval requirement on a programmatic basis, LLRTs would not be required at PNPS until 12/12/86.

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. Section 1.0.0 as the "interval between the end of one refueling outage and the end of the next 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.

The T.S. definition 1.0.U Surveillance Frequency considers the operating cycle interval to be 18 months. This interval may be adjusted plus 25% as long as the total maximum combined interval time for any three consecutive tests shall not exceed 3.25 times the specified interval. BECO considers that this definition applies to the calibration of instrument and electrical components and therefore is not applicable to LLRT.

This report is submitted to describe the need for clarification of 10CFR50 Appendix J requirements. Our licensing department is planning to seek clarification of this issue from the Office of Nuclear Reactor Regulation by September 30, 1986.

Prior to entering any condition where primary containment is required, both local and integrated leak rate testing will be successfully completed. Also, while clarification of this issue is pending, we will conduct our LLRT program to ensure that the interval between tests does not exceed two years for any primary containment isolation valve or penetration.



**BOSTON EDISON**

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**James M. Lydon**  
Chief Operating Officer

September 23, 1986  
BECo Ltr. #86-144

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

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

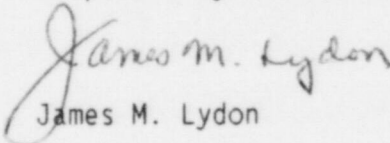
Dear Sir:

The attached update Licensee Event Report 86-015-01, "Primary Containment Local Leak Rate Test Frequency" is hereby submitted in accordance with the requirements of 10CFR50.73.

This update report is to clarify the meanings of "programmatic" and "operating cycle" as they apply to Leak Rate Testing, and to revise previous commitment to pursue clarification from the Office of Nuclear Reactor Regulation from August 30 to September 30, 1986.

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

Respectfully submitted,

  
James M. Lydon

BL/ko

Enclosure: LER 86-015-01

cc: Dr. Thomas E. Murley  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
631 Park Avenue - Region 1  
King of Prussia, PA 19406

Standard BECo LER Distribution

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