



Boston Edison

Pilgrim Nuclear Power Station
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BECo Ltr. 97- 095

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

Docket No. 50-293
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Update of GL 89-13 Response

This letter updates Boston Edison Company's (BECo) response to Generic Letter (GL) 89-13 submitted to the NRC by BECo letter dated April 2, 1990 (No. 90-047).

Mussel Monitor Removal

The referenced response to GL89-13 describes an on-line mussel monitoring system consisting of side-stream mussel monitors. These monitors were intended to track actual or potential mussel fouling within the (SSW) system. Such tracking would eliminate the need to perform on-line physical inspections of the SSW piping and heat exchangers to assess the SSW chlorination program's effectiveness in preventing mussel fouling.

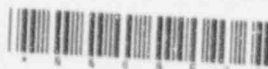
We have since disconnected the monitors by cutting and capping to ensure the reactor building closed cooling water (RBCCW) system's seismic integrity. The monitors will not be returned to service because they did not reliably perform their intended function.

However, their removal does not impact the safe operation of Pilgrim. Piping and heat exchanger inspections performed during refueling and SSW system outages since 1983 have shown no significant mussel fouling in the SSW system when continuous chlorination is used for biofouling control. Hence, the effectiveness of continuous chlorination in preventing mussel attachment and growth has been demonstrated, and the need for the side-stream mussel monitoring system to gather data has been eliminated.

Chlorine Monitor Removal

For the seismic reasons given above, the connection between the continuous chlorine monitor was removed from service and grab samples were substituted. The permanent substitution of grab samples for continuous chlorine monitoring requires the approval of the U.S. Environmental Protection Agency (USEPA). We are currently processing such a request to the USEPA. When permission is granted, we will notify the NRC of the continuous chlorines monitor's permanent removal from service.

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Quality Control Inspection Reports

Pilgrim's April 2, 1990, GL89-13 response stated, "The PNPS Quality Control Group prepares an inspection report upon the completion of safety related maintenance." Our work control process has changed since our original submittal and this statement requires additional clarification.

The inspection team (Quality Control Group) performs inspections of safety-related and non safety-related maintenance at various points and times during the maintenance processes. The maintenance work selected for inspection and the intensity of inspection coverage is dependent on the nature of the work being performed and its relative potential impact on safety. Depending on the safety significance of the work, inspection coverage may range from continuous to no coverage.

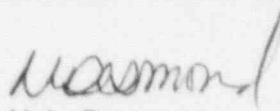
The nature of the maintenance being performed determines if the work is inspected at the end of the effort or if inspection needs to be a part of the maintenance process. In-process inspection is implemented at hold points. Whenever inspections are performed, appropriate documentation is prepared. Preparation of such reports follows inspection and does not necessarily occur at the completion of safety-related maintenance.

Commitments

This letter makes the following commitment:

- Update the NRC by letter on the SSW continuous chlorine monitor issue following EPA disposition.

Should you require further information on the removal of the side-stream mussel monitors, please contact P.M.Kahler at (508)830-7939.


N. L. Desmond

PMK/dmc/GL89-13

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