

Pilgrim Nuclear Power Station Rocky Hill Road Plymouth, Massachusetts 02360

E. T. Boulette, PhD Senior Vice President - Nuclear March 7, 1997 BECo Ltr. 2.97.027

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

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

## Changes to Technical Specification Bases for Core Alterations

The Technical Specification (TS) Bases for Section 3.10 "Core Alterations" for Pilgrim Station have been revised. These Bases include a discussion of "Spiral Unloading" which was inserted into the Pilgrim Technical Specifications in Amendment 39 (BECo letter November 21, 1979, NRC letter January 8, 1980) and modified by a change transmitted in a BECo letter dated May 7, 1991 (included with Amendment #137 dated June 19, 1991).

During the last cycle, Pilgrim was operated with some control rods completely inserted to suppress indications of a damaged fuel pin. During the current refueling outage, it was desirable to remove the suspect fuel bundles early to begin inspection and reconstitution of the damaged bundle. Because a spiral unloading of the fuel was planned, a change to the "Core Alterations" Bases was necessary to allow removal of suspect fuel bundles out of the planned sequence.

We performed a 50.59 safety evaluation (#3051) that concluded removing fuel from five cells is acceptable provided the fuel bundles removed do not completely surround and isolate a source range monitor from the rest of the core. We therefore, have proceeded with a change to the "Core Alterations" Bases.

In accordance with 10CFR50.36(a), bases are not a part of the Technical Specifications. Therefore, this Bases change does not constitute an amendment to the operating license and prior NRC approval is not required. However, this change has been reviewed by the senior management and the Pilgrim Operations Review Committee. Please incorporate this Bases change into your copy of 'ne Pilgrim Nuclear Station Technical Specifications by replacing page B3/4.10-2 with the attached Revision 192 page.

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Attachment: TS Revision 192

E. T. Boulette, PhD

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U.S. Nuclear Regulatory Commission Page 2

cc: Mr. Alan B. Wang, Project Manager
Project Directorate I-1
Office Of Nuclear Reactor Regu'ation
Mail Stop: 14B2
1 White Flint North
11555 Rockville Pike
Rockville, MD 20852

U.S. Nuclear Regulatory Commission Region I 475 Allendale Road King of Prussia, PA 19406

Senior Resident Inspector Pilgrim Nuclear Power Station

Mr. Robert Hallisey Radiation Control Program Center for Communicable Diseases Mass. Dept. of Public Health 305 South Street Jamaica Plain, MA 02130

Mr. Peter LaPorte, Director
Massachusetts Energy Management Agency
400 Worcester Road
P.O. Fox 1496
Framingham, MA 01701-0313
Attn: Mr. James Muckerheide