

BOSTON EDISON COMPANY
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BOSTON, MASSACHUSETTS 02199

G. CARL ANDOGNINI
SUPERINTENDENT
NUCLEAR OPERATIONS DEPARTMENT

July 10, 1979

BECO. Ltr. #79-139

Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch
Office of Inspection and Enforcement
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA. 19406

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

Response to IE Inspection No. 79-06

Dear Sir:

Inspection No. 79-06, dated June 18, 1979, contained one item of non-compliance. Boston Edison Company's response to that item is presented as follows:

Deficiency

Technical Specification 6.8.A states in part, "Written procedures and administrative policies shall be established, implemented, . . ."

Procedure 8.5.1.1, Core Spray Pump Operability Test and Flow Rate Test, written to satisfy Technical Specification 4.5.A.1.d., requires that the tested pumps meet the acceptance criteria of at least 3,600 gpm with a discharge pressure of at least 252 psig.

10 CFR 50, Appendix B, Criterion XI states in part, "Test results shall be documented and evaluated to assure that test requirements have been satisfied."

Contrary to the above, data from the September 7, 1978, surveillance test contained capacity values of 3,575 gpm and 262 psig for Core Spray Pump 215A. Documentation to substantiate the performance of a retest could not be located. Data to date from subsequent surveillance tests have satisfied the acceptance criteria.

Response

Personnel performing the surveillance had recognized the fact that acceptance criteria had not been met, however, section "B" under acceptance criteria on the surveillance signoff sheet directed shift personnel to forward the form

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for additional review if they do not observe a flow of at least 3600 gpm. This additional review utilizes pump curves to determine if operability conditions are satisfied.

A similar occurrence happened on August 7, 1978, and was reviewed by ORC in Meeting 78-38 held on August 9, 1978. During discussion of this event, it was identified that the data for Core Spray Pump operability had indicated marginal acceptance several times since construction. The Performance Group was assigned responsibility for reviewing the acceptance criteria of Surveillance Test 8.5.1.1 and determining its validity.

When the surveillances were performed on September 7, 1978, these reviews were still in progress and the procedure still required forwarding the surveillance for further evaluation. Station personnel do remember having the followup test performed and receiving satisfactory results, however, the documentation cannot be recovered.

Surveillance procedure 8.5.1.1 Core Spray Pump Operability and Flow Rate Test has been revised to preclude a reoccurrence of the situation delineated in the Item of Noncompliance. This procedural revision places responsibility for evaluating test data to determine if the testing requirements were satisfied with the Operations Group which performed the test.

If the surveillance does not meet the acceptance criteria as specified, the Core Spray Pump must be declared inoperable and redundant component operability verified in accordance with Technical Specifications.

At the present time we are in compliance in this area.

We believe this letter is responsive to your concerns. However, should you have any further questions or concerns please contact us.

Very truly yours,

