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GENERAL OFFICES 800 BOYLSTON STREET
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A. V. MORISI
MANAGER
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

June 3, 1981

BECO. Ltr. #81-122

Mr. Eldon J. Brunner, Chief
Projects Branch #1
Division of Resident and Project Inspection
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA. 19406

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

Dear Sir:

The following is in response to your letter of February 12, 1980, IE Inspection Report Number 80-30:

Finding

The licensee committed in correspondence of August 21, 1979, and December 19, 1979, to limit the operation of the containment purge and vent valves (other than those used for drywell-torus d/p control) to 90 hours per year during power operation.

Contrary to the above, on November 21, 1980, the licensee had not implemented controls to limit the operation of the containment purge and vent valves to 90 hours per year during power operation. The licensee determined that, since plant startup following the January - May 1980 refueling outage, that the 20 inch purge valves had been opened for approximately 145 hours during power operation (greater than one percent power).

Response

Oper 30, entitled "Drywell Venting Data Sheet" an attachment to station procedure number 2.2.70, entitled "Primary Containment Atmospheric Control System" was revised to require management notification after 60 hours of "open time on" these valves. To supplement these procedural controls and ensure that operating personnel were alerted to changes in the status of the 20 inch purge valves, Oper 38, entitled "Shift Turnover Sheet", an attachment to station procedure 1.3.18, Revision 8, entitled "Relief of Personnel", is also being revised. Per shift and year to date closure times on the eight vent and purge valves will be recorded each shift. The acceptance criteria will specify that station management be notified when a predetermined "amt. of open time" exceeded. The supplemental procedure change will be completed by July 1, 1981.

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Finding

The licensee committed in correspondence of October 15, 1980 to limit a member of the required shift staff from working more than 12 hours straight while performing safety related control room duties.

Contrary to the above, between November 21 and 24, 1980, a control room operator had been on watch for 32 straight hours.

Response

Boston Edison has established an overtime policy for licensed operators. This policy is not applicable to non-licensed personnel. To implement this policy, station procedure 1.3.17, entitled "Manning of Control Room", has been revised to include the following:

"Every effort shall be made to obtain a qualified relief to ensure that a licensed operator does not exceed twelve (12) hours in the control room performing nuclear safety related functions. Approval from the Nuclear Operations Manager or his Deputy shall be obtained to exceed this twelve (12) hours, however, under no circumstance shall the licensed operator exceed 16 hours performing nuclear safety related control room functions."

To assist in adherence to this policy, the Deputy Nuclear Operations Manager has instructed operating personnel to record in the Watch Engineer Log Book the specific duty assignments of each individual on the operating shift. This practice is currently in use and will be incorporated into station procedure 1.3.18 by July 1, 1981.

We believe these responses to be satisfactory. If you have further questions regarding these items please contact us.

Very truly yours,

W. H. Deacon for *A. V. McKrisi*