

BOSTON EDISON COMPANY
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A. V. MORISI
MANAGER
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

June 29, 1981

BECO. Ltr. #81-144

Mr. Eldon J. Brunner, Chief
Projects Branch #1
Division of Resident & Project Inspection
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 81-07

Dear Sir:

This letter contains responses to items described in Inspection 81-07, NRC
letter of June 1, 1981:

Notice of Violation A

Technical Specification 3.12.F states that "with a fire barrier not functional, a continuous fire patrol shall be established on at least one side of the affected penetration within one hour". Technical Specification 6.8.D states that "written procedures to implement the Fire Protection Program shall be established, implemented, and maintained".

Station Procedure No. 8.B.14 "Fire Watch", Revision 0, requires that "when a fire patrol is required, the Watch Engineer will contact the cognizant duty Security Police Supervisor and request that a member of the security force be dispatched to the control room for fire patrol duty. An entry should then be made in the control room log... The fire patrol log sheet for either hourly or constant patrol is to be initiated by the Watch Engineer..."

Contrary to the above, fire door number 64 in the Emergency Diesel Generator Room was kept open to allow passage of an air hose between 4:30 pm on March 29, 1981 and 3 pm on March 30, 1981 with no documentation of all the required fire patrols being performed.

Response A

Memos (CR81-10 and CR81-11) have been submitted to the Watch Engineers, Nuclear Operating Supervisor, and to the Security Force to re-emphasize the actions that must be taken if fire doors are found open. The Security Force shall notify the Watch Engineer immediately should there be an indication (by door indicator) that the door did not close within the allowable specified time.

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To preclude recurrence, a Security Force procedure shall be written to address the required actions.

The new security procedure, No. 1.11 shall be in effect by July 30, 1981.

Notification of Violation B

The Pilgrim Nuclear Power Station Security Plan, Revision 6, dated March 1, 1981, Section 1.6.2.1.3, states that "The vital areas which require third level access controls are the Containment, Cable Spreading Room, and Control Room. The authorized input list will be further restricted to only those individuals required for the safe and efficient operation of the plant". Section 1.6.3 further states that "As in the case of employee personnel, security force members will control contractor access at all times and maintain an approved list of contractor personnel."

Station Security Procedure No. 2.02 "Controlled Building Access", Revision 4, Section II.C.3, states that "...During maintenance periods and outages, required personnel shall be authorized entry into the drywell. Approval for entry shall be accomplished via an authorization list from Station BECc. management personnel or their designees. This list shall be provided to the Security Officer on duty at that location, and shall be used as a reference source prior to allowing individual entry into the area."

Contrary to the above, at about 4:00 pm on March 6, 1981, two contractor personnel were in the drywell during a maintenance period, and had been allowed entry without a specific authorization list from BECc management present or used by the Security Guard on duty at the entrance.

Response B

The immediate action taken was to have an Access List placed at the Drywell. This action provides full compliance.

However, to eliminate the possibility of inadvertent unauthorized entry, reduce the administrative burden, and to avoid another noncompliance of this nature, a card reader will be placed in the Blockhouse. All individuals requiring access to the Drywell must have their Sygnatron access control key cards upgraded for this work assignment prior to entry.

The date for installation of this card reader is tentatively set as September 15, 1981. The commission will be advised before the due date if this installation requires rescheduling.

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We believe the above responses to satisfactorily address the inspection items. If, after reviewing them, you should have further questions, please do not hesitate to contact us.

Very truly yours,

A. Morisi

Commonwealth of Massachusetts)
County of Suffolk)

Then personally appeared before me A. Victor Morisi, who, being duly sworn, did state that he is Manager - Nuclear Operations Support of Boston Edison Company, the applicant herein, and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My Commission expires: *July 6, 1984*

Dorothy M. Lopez
Notary Public