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MANAGER
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

September 8, 1981

BECO Ltr. #81-212

Mr. Thomas A. Ippolito, Chief
Operating Reactors Branch #2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555



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

Response to IE Inspection #81-12

Dear Sir:

The following contains Boston Edison's response to items identified by IE Inspection 81-12, NRC letter of July 29, 1981:

Notice of Violation, Appendix A, Item (1)

ANSI N18.7-1972, Section 5.3.2.4, states that "procedures should identify those independent actions or procedures that should be completed and plant conditions that should exist prior to its use." Station Procedure No. 2.2.87, "Control Rod Drive System", Revision 8, does not require a Shutdown Margin calculation/verification (to ensure that Technical Specification Sections 3.3.A.2.b, 3.3.A.1, and 4.3.A.1 are met) prior to making a control rod inoperable. On May 21, 1981, control rod no. 22-35 was valved out of service in the full out position with the reactor at power. It was not until May 29, 1981 that the licensee received calculations from General Electric Co. which verified that the required Shutdown Margin had been met.

Response

Reactor Engineering personnel are cognizant of their responsibility for supplying the Watch Engineer with confirmation that the shutdown margin is being maintained prior to valving a control rod out of service.

Procedure 2.2.87 has been revised to state that Reactor Engineering must be consulted regarding the shutdown margin, and must confirm that it is being maintained when a control rod is valved out of service.

Full compliance has been achieved.

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Mr. Thomas A. Ippolito, Chief
September 8, 1981
Page 2

Notice of Violation, Appendix A, Item (2)

ANSI N18.7-1072, Section 5.3.4.4, states that "The limits (maximum and minimum) for significant process parameters should be identified. The nature and frequency of this monitoring shall be covered by operating procedures, as appropriate." Station Procedure No. 2.2.70 "Primary Containment Atmospheric System", Revision 16, requires operation of the Standby Gas Treatment System, per Procedure No. 2.2.50, when inerting and venting the drywell or torus. Technical Specification 4.7.B.1.a(6) requires a laboratory analysis of the charcoal filters of the Standby Gas Treatment System (SGTS) after every 720 hours of operation. Neither procedure (2.2.70, nor 2.2.50) specifies requirements to keep accurate times for each filter train of the SGTS. On May 6, 1981, the licensee was logging times that either the 'A' or 'B' SGTS fan was in operation; however, since April, 1981, the licensees had placed the SGTS dampers in the open position and therefore whenever either fan was run, both filters would be in operation.

Response

Interim management controls have been implemented to monitor and log the operational run times for each filter train of SBSTS. Procedure 1.3.34, Conduct of Operations, and OPER-38 are being revised to address the operational run time on the SGTS. The run time shall be logged for each SGTS on a watch-to-watch basis.

Full compliance shall be achieved by September 30, 1981.

Notice of Violation, Appendix A, Item (3)

ANSI N18.7-1972, Section 5.1, states that "In particular, written administrative policies shall be provided to control the issuance of documents, including changes..." Station Procedure No. 1.3.8, Document Control, Revision 25, was inadequate in that it does not address control of procedures which are posted at various locations throughout the station. At various times during May, 1981, copies of an out of date (retired) procedure No. 5.3.1, "Shutdown From Outside the Control Room", were posted in the Emergency Diesel Room, at ECCS equipment, and at 4160v and 480v switchgear.

Response

The immediate concern of retired procedures, such as 5.3.1, was corrected by removing and replacing them in their respective locations. To preclude recurrence, Procedure 1.3.8 and associated work instructions shall be revised by October 30, 1981.

Notice of Violation, Appendix A, Item (4)

ANSI N18.7-1972, Section 5.3.3, states that "Instructions for energizing, filling, venting, draining, startup, shutting down, changing modes of operation, and other instructions appropriate for operations of systems related to safety of the plant shall be delineated in system procedures..." Station Procedures for operations of the Residual Heat Removal (RHR) System (2.2.86, Revision 13) and the Fuel Pool

Mr. Thomas A. Ippolito, Chief
September 8, 1981
Page 3

Cooling and Cleanup System (FPCCS) (2.2.85, Revision 8) were inadequate in that they did not specify the normal position of the RHR-to-Fuel Pool spectacle flanges; nor mention repositioning these flanges when using the FPCCS to clean up water from the torus via the RHR System.

Response

Currently, the system is red-tagged in order not to permit use of the spectacle flanges during normal power operations. Procedures 2.2.85 and 2.2.86 are being updated to include coverage of the normal position of the spectacle flanges during normal operation.

Full compliance shall be achieved by September 30, 1981.

Notice of Violation, Appendix A, Item (5)

ANSI N18.7-1972, Section 5.3.6, states that "...the procedures shall have provisions for meeting surveillance schedules and for assuring measurement accuracies adequate to keep safety parameters within operational and safety limits." Technical Specification Table 3.7.1 specifies that the two RHR discharge isolation valves to radwaste must close in less than or equal to 20 seconds. Two of the licensee's procedures "8.7.4.3 Test Isolation Valves Except MSIV's", Revision 5, and 8.5.2.1 "LPCI Subsystem Operability Surveillance Test", Revision 7, were inadequate in that they specified that the maximum acceptable closing time for the RHR to Radwaste Isolation Valves (1001-21, 1001-32) was 25 seconds.

Revision

SROs 81-12 and -13 were issued June 2, 1981 to correct the maximal allowable closing time of the two RHR discharge isolation valves to 20 seconds. This change also has been incorporated into Revision 4, Procedure 8.7.4.3, on June 3, 1981 and into Revision 8, Procedure 8.5.2.1, on June 24, 1981.

Full compliance has been achieved.

Notice of Violation, Appendix A, Item (6)

ANSI N18.7-1972, Section 5.3.6 states that "...The procedures shall have provisions... for assuring measurement accuracies adequate to keep safety parameters within operational and safety limits." Procedure No. 8.8.1.8, Local Leak Rate Testing of Feedwater Check Valves, Revision 7, was inadequate in that the acceptance criteria in Section IX was not consistent with Technical Specification Section 4.7.A.2.f.

Response

Procedure 8.7.1.8, "Local Leak Rate Testing of Feedwater Check Valves," has been revised.

Full compliance has been achieved.

BOSTON EDISON COMPANY

Mr. Thomas A. Ippolito, Chief
September 8, 1981
Page 4

Notice of Violation, Appendix A, Item (7)

ANSI N18.7-1972, Section 5.3.3, states that "Instructions for ... filling, venting, draining, ... shall be delineated in system procedures. Procedure No. 8.7.1.5, "Local Leak Rate Testing of Primary Containment Penetrations and Isolation Valves", Revision 8, was inadequate in that many system figures (providing the lineup for individual valves) included incorrect locations for venting and draining during leak rate testing.

Responses

The corrective action will be to revise procedure 8.7.1.5 to clarify the "venting, draining, filling ...". The revision to 8.7.1.5 shall delineate the procedure for performing each test including the 'venting, draining, filling...'

This action involves new more complete sketches of the piping and valving to be tested, and instructions for performing each test. This action is extremely labor intensive. An estimated 300 man-hours will be required to review and revise the system sketches; additional man-hours will be required to validate the work.

Changes to Procedure 8.7.1.5 sketches will be drafted and validated concomitantly with the testing during the 1981 outage.

Full compliance will be achieved by 1/1/82.

We believe the above response satisfactorily addresses the identified items. Should you have further questions concerning this response after reviewing it, please contact us.

Very truly yours,

A. Victor 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:

Jan. 17, 1986

Harrison R. Balfour
Notary Public