

BOSTON EDISON COMPANY
GENERAL OFFICES 800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02119



November 13, 1981
BECo. Ltr. #81-266

A. V. MORISI
MANAGER
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

Mr. Victor Stello, Jr.
Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Revised Response to IE Inspection 80-09

- References: (A) NRC letter of July 9, 1980
(BECo. Ltr #1.80.233)
- (B) BECo Response letter of August 1, 1980
(BECo. Ltr #2.80.166)

Dear Sir:

This letter contains a revised response which is intended to amend our initial response (Ref B) to Reference (A). Reference (A) contained the following:

PNPS Procedure 1.3.7, "Records", Revision 17, requires the Operating Supervisor and Control Room Operator to log in the Station Operations Log a minute-by minute account of the operation of the plant, and that this should include everything that is happening in the plant.

Contrary to the above, the movement of irradiated fuel in the spent fuel pool, the violation of Technical Specification 3.7.C.1 and the notification of NRC of the incident, were not logged in the Station Operations Log on March 8, 1980.

The germane portion of our response to this item, contained in Reference (B), stated the following:

Pilgrim Station maintains an additional operations log during refueling outages - the Refueling Floor Supervisor's/Coordinator's Log. The practice of keeping this additional log was initiated during Refuel 2 in 1975, and has been utilized during each subsequent refueling outage including the one occurring in 1980. This log is maintained in the main control room and an account of all licensed refueling floor activities is documented in this log by the individuals supervising activities on the refueling floor. A review of this log revealed that on March 8, 1980, the movement of irradiated fuel in the spent fuel pool, was logged by the Senior Reactor Operator in charge of the refueling floor as required. Although we believe this practice fully satisfied the intent of Procedure 1.3.7, in order to expressly delineate the practice of utilizing this additional log during refueling outages, Procedure No. 1.3.7, "Records", will be revised to explicitly reference the refueling log. It is expected

8111200578 811113
PDR ADOCK 05000293
Q PDR

IE01
S10

BOSTON EDISON COMPANY

Mr. Victor Stello, Jr.

November 13, 1981

Page 2

that this revision will be implemented by September 1, 1980.

The revision to Procedure 1.3.7, "Records" was prepared and submitted to the On Site Review Committee (ORC) for approval. The ORC (ORC meeting 81-11) reviewed the proposed revision, and determined it to be unnecessary because the Station Operation's Log is adequate for the logging of refueling activities. Therefore, Procedure 1.3.7 was not revised as described in Reference (B).

In place of this procedural revision, and to prevent recurrence of the deficiency described in Reference (A), the Day Watch Engineer has instructed Operation's personnel that they shall continuously log refueling activities in the Station Operation's Log. Also, the activities of the Refueling Floor SRO (RFSRO) shall be summarized in the Station Operation's Log before the RFSRO completes his shift per Procedure 4.3.

We believe this revised response satisfactorily addresses the concerns of IEI 80-09, Item IIC, and will prevent recurrence of the indicated deficiency. Should you require further information concerning this revision, please contact us.

Very truly yours,

J. M. Felt
JMF/AVM