

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

July 3, 1981

BECO. Ltr. #81-151

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 #81-08

Dear Sir:

Inspection #81-08, dated June 2, 1981, contained three items of non-compliance. Boston Edison Company's response to those items is presented as follows:

Notice of Violation A

Technical Specification 6.8.A requires that "procedures be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1, 5.3 of ANSI N18.7-1972...". Section 5.1.5 of ANSI N18.7-1972 requires the use of procedures for equipment control and tagging.

Station Procedure No. 1.4.5 "PNPS Tagging Procedure", Revision 8, Section III.B, requires that protective tags be attached securely to controls..., that if the tag could become illegible it should be inserted in a transparent holder, and that red tags placed on equipment without an accompanying maintenance request must be logged in the Red Tag Log.

Contrary to the above, between April 16, 1981 and April 27, 1981, the following conditions existed:

- Two red tags attached to the CARDOX tank fill valves in the turbine building were not logged in the Red Tag Log.
- A red tag attached to the outlet valve in the nitrogen supply line to the TIP room downstream of meter FQ5028 in the reactor building was not logged in the Red Tag Log.
- Two tags attached to the Auxiliary Heating Boilers were illegible and covered with paint: and one was attached to the light bulb and not the appropriate control switch.
- A red tag attached to a service air outlet connection isolation valve in the west end of the Radwaste Corridor was not logged in the Red Tag Log and had not been properly authorized.

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- Two red tags attached to fittings (for a 3/8 inch air hose connecting the non essential instrument air to the service air for the flat bed filter seals) in the Radwaste Corridor were not logged in the Red Tag Log.

Response A

A semiannual review of outstanding maintenance requests shall be performed, and an inspection of all red tags at the station shall be made. The reviews and inspections and associated findings shall be documented.

The necessity, importance and proper use of protective red tags shall be emphasized at General Employee Training sessions.

Full compliance with the above-mentioned corrective measures shall be in effect by September 1, 1981.

Notice of Violation B

Technical Specification 6.8.A requires that "procedures be established, implemented, and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.1972". Sections 5.3.3 and 5.3.4.1 of ANSI 18.7-1972 require the use of procedures for system operation and plant startup including the confirmation of valve and instrument lineups.

Station Procedure No. 2.1.11 "Current Valve Lineup File". Revision 0, Section IV, requires that a complete new valve lineup be made following each extended shutdown, and that these lineup sheets be signed as indicated thereon, and returned to the control room for filing in the Current Valve Lineup File.

Contrary to the above, on April 20, 1981, the current system lineup check sheets (which were performed prior to startup from the January - May, 1980 refueling outage) on file for the following systems had not been signed by the Watch Engineer indicating his review and acceptance prior to system operation:

<u>Procedure Number</u>	<u>System</u>	<u>Appendix Not Signed</u>
2.2.21	HPCI	A and B
2.2.23	ADS	A
2.2.77	Drywell Leak Detection	A
2.2.32	Service ter	A
2.2.22	RCIC	A

In addition, the completed system valve lineup check sheets for the Low Pressure Coolant Injection (LPCI) and the Drywell Leak Detection System identified valves out of the normal position with no explanation or reason provided.

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Response B

Surveillance procedures are currently being changed to require two verifications of procedurally referenced valve lineups.

Valve lineups that are necessary after the next refueling outage shall be tracked on a computerized plan. The final verification of proper valve lineup shall be performed by a supervisor.

The above corrective measures shall be completed by September 1, 1981.

Notice of Violation C

10 CFR 50.59(b) states in part that "the licensee shall maintain records of changes in the facility...to the extent that such changes constitute changes in the facility as described in the safety analysis report... These records shall include a written safety evaluation which provides the basis for the determination that the change...does not involve an unreviewed safety question."

Contrary to the above, on April 27, 1981, modifications had been made to the Instrument Air and Service Systems as described in the FSAR Section 10.11.3, and FSAR Figure 10.11-1 (Instrument Air and Service Air P&ID), without a safety evaluation having been performed.

Response C

The issue of temporary modifications to systems described in the FSAR being made without a safety evaluation having been performed was discussed at an ORC meeting on June 17, 1981. It was agreed to put in Procedure 3.M.1-3, "Lifted Wire and Temporary Jumpers" a method which allows for a documented safety evaluation basis. The revision of this procedure shall encompass an expansion of it to include a wider spectrum of "temporary modifications". Although we have not completed our corrective action plan, we estimate that the revised procedure, which will be moved from the maintenance section to the administrative section, will be ready for issuance and implementation by September 15, 1981.

We trust that these responses are satisfactory; however, should you have any further questions, please do not hesitate to 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 Dept. 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