

BOSTON EDISON COMPANY
GENERAL OFFICES 800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

March 18, 1982

BECO Ltr. #82-85

Mr. Thomas T. Martin, Director
Division of Engineering and Technical
Inspection
Region I
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 81-36

Reference (A): NRC Letter of February 16, 1982
to A.V. Morisi (Boston Edison
Ltr. #: 1.82.039)

Dear Sir:

Boston Edison submits the following in response to the items of non-compliance identified in Reference (A).

Appendix A, Item A

Technical Specification 6.8.A states that policies shall be established that meet or exceed the requirements of Section 5.1 of ANSI N18.7-1972.

ANSI N18.1972, Paragraph 5.1.7 states in part "...Provisions shall be made for performing scheduled surveillance testing. Such provisions shall include the establishment of a master surveillance schedule reflecting the status of all planned in-plant surveillance testing....".

Contrary to the above, as of December 4, 1981, a master surveillance scheduled for planned in-plant surveillance testing had not been established.

Response to Item A

Corrective Action Taken and Results Achieved:

A master Surveillance Test List and Tracking Program have been developed and are currently being utilized. The methodology used has been reflected in a draft procedure (PNPS Procedure 1.8).

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Actions to Preclude Recurrence:

The Master Surveillance Tracking Program continues to be implemented in parallel with the review and approval of Procedure 1.8.

Although the Tracking System is currently in place, Boston Edison intends to provide training for affected user groups. Therefore, full compliance will be achieved by June 15, 1982.

Appendix A, Item B

Technical Specification 6.8.A states that written procedures and administrative policies shall be established and implemented.

Station Procedure 1.3.6, "Adherence To Technical Specifications", paragraph II, states in part, ". . . Amendments to (the Facility Operating License) will be promptly processed to ensure that controlled copies of the Technical Specifications utilized for reference reflect the stations latest commitments . . .".

Contrary to the above, on December 3, 1981, the controlled copy of the Technical Specifications maintained in Control Room did not properly reflect the latest status of Technical Specification amendments in that:

- License Amendment 49, received by the Station during October, 1981, had not yet been posted.
- License Amendment 50 had been placed in front of the Technical Specification, but had not been posted as a page for page replacement as required by the Amendment instructions.
- One page of Amendment 38 was posted to the Technical Specification without removing the page being replaced.

Response to Item B

Corrective Action Taken and Results Achieved:

As discussed in the inspection report the posting deficiencies for Amendments 38, 49 and 50 were corrected in December, 1981.

Actions to Preclude Recurrence:

The individual who has responsibility for maintaining the Control Room copy current has been advised to pay closer attention to detail in the posting of amendments. Full compliance has been achieved as of 3/16/82.

Appendix A, Item C

10 CFR 50, Appendix B, Criterion II, requires that suitable environmental conditions be established for activities affecting quality and that adequate cleanliness be maintained.

The Boston Edison Quality Assurance Manual (BEQAM) paragraphs 2.2.2.11 and 2.2.2.12 requires conformance with Regulatory Guide 1.33 - 1978, "QA Program Requirements (Operation)" and Regulatory Guide 1.39 - 1977, "Housekeeping Requirements for Water - Cooled Nuclear Power Plant". These regulatory guides, in turn, require conformance to ANSI N18.7-1976, ". . .Quality Assurance for the Operational Phase of Nuclear Power Plants" ANSI N45.2.1 - 1973, "Cleaning of Fluid Systems and Associated Components During Construction Phase of Nuclear Power Plants" as they are applicable to the operational phase of nuclear power plants. ANSI N45.2.3 requires that housekeeping personnel training be established and delineated in procedures. ANSI N45.2.1 requires that procedures be established for cleaning or verifying cleanness of components/systems.

Contrary to the above, as of December 4, 1981, neither programs nor procedures have been established which conform to the above standards in that:

- Station Procedure 1.4.6, "Housekeeping", did not establish housekeeping zones, methods for protecting open quality systems, maintaining housekeeping records, or means of training personnel; and
- No procedures have been established for cleaning or verifying cleanness of quality systems or components.

Response to Item C

Corrective Action Taken and Results Achieved:

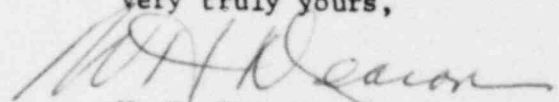
BECO has developed a plan to complete the formalization of the existing elements (such as pre-closure inspection of MSIV's, Torus and Drywell) of our housekeeping program.

Actions to Preclude Recurrence:

We will formalize our housekeeping program by June 2, 1982.

We believe this response satisfactorily addresses the issues identified in the subject Inspection. Should you require further information concerning this response, please contact us.

Very truly yours,



W. H. Deacon
Acting Manager
Nuclear Operations Support

BOSTON EDISON COMPANY

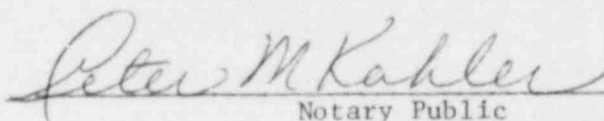
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Commonwealth of Massachusetts)
County of Suffolk)

Then personally appeared before me, William H. Deacon, who, being duly sworn, did state that he is Acting 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:

October 21, 1988


Notary Public