

BOSTON EDISON COMPANY  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

April 2, 1982

BECO. Ltr. #82-95

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

IE Inspection 82-04

- References: (A) Response to Inspection 81-12,  
dated September 8, 1981  
(BECO Ltr. #2.81.212)
- (B) Confirmatory Action Letter 82-05,  
dated February 18, 1982 (BECO Ltr.  
#1.82.041)
- (C) IE Inspection 82-04, dated March 4,  
1982 (BECO Ltr. #1.82.059)
- (D) Response to Confirmatory Action  
Letter 82-05, dated March 24, 1982  
(BECO Ltr. #2.82.84)

Dear Sir:

This submittal responds to concerns identified in Inspection 82-04, Reference (C).

Violation A

Technical Specification 6.8.A requires that written procedures be established and implemented.

Contrary to the above, the following are examples where station procedures were not properly implemented.

- (1) On four occasions, October 20, 1981, and December 2, 3, 4, 1981 the licensee conducted local leak rate tests on feedwater containment isolation valves 58 A&B with air. This method did not conform to the water seal method prescribed on the valve lineup of procedure 8.7.1.8, Revision 6, Local Leak Rate Test of Feedwater Check Valves.

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Mr. Thomas T. Martin, Director

April 2, 1982

Page 2

- (2) Procedure 1.3.8, Revision 25, Document Control Section 4.c requires that notification be given to the Management Services Group when it is observed that a Piping and Instrumentation Diagram (P&ID) should be revised. As of January 29, 1982, this notification requirement had not been initiated by several licensee personnel who were aware of certain drawing errors since October 1981.

Response to Notice of Violation A (INC 82-04-02)

In response to Item A(1) of Appendix A, we wish to point out that there are two procedures which prescribe methods for leak rate testing feedwater check valves; 8.7.1.5 Local Leak Rate Testing of Primary Containment Penetrations and Isolation Valves and 8.7.1.8 Local Leak Rate Testing of Feedwater Check Valves. Procedure 8.7.1.5 prescribes the test method utilizing air while Procedure 8.7.1.8 prescribes a test method utilizing water.

On October 20, 1981 and December 2, 3 and 4, 1981, local leak rate tests were conducted with air, on feedwater containment isolation valves 58A and B in accordance with the appropriate procedure, 8.7.1.5. However, a drawing which is an attachment to Procedure 8.7.1.8 is needed to perform the test described in Procedure 8.7.1.5 and is so appropriately referenced. To eliminate this potentially confusing point, Procedure 8.7.1.8 is being retired and all pertinent drawings incorporated within Procedure 8.7.1.5.

In response to Item A(2) of Appendix A, we agree with your stated interpretation of the requirements of Procedure 1.3.8. However, we must point out, that the situation you describe in Item A(2) was an effort being undertaken in response to a previously identified item of non-compliance (Inspection 50-293/81-12 Item 7). In responding to that violation we stated that drawings involved in testing would be upgraded concomitantly with the imminent Refueling Outage. This response also pointed out the substantial time and manpower resources that we would provide to address this issue in a comprehensive manner.

The scope and significance of this effort were greatly enlarged as a result of verbal communications between NRC and Boston Edison, and were promulgated on page 2 of Reference (B), which stated the following:

- a. Conduct a walkdown of all safety systems to include the following: those which contain automatic and/or manual containment isolation valves, the emergency core cooling systems, and those portions of the containment atmosphere control system which pertain to nitrogen supply and containment purge. Revise system operating and valve lineup procedures to reflect as-built system configuration prior to startup.
- b. Revise or modify safety system drawings (P&IDS) to indicate as-built conditions prior to startup.

Mr. Thomas T. Martin, Director

April 2, 1982

Page 3

The results of answering these issues are contained in Attachment C of Reference (D), which indicates that we are in full compliance.

When Inspection 82-04 was conducted, we were in the midst of performing those tasks necessary to satisfy the demands of the above issues. Information necessary for updating of the leak rate testing figures and P&ID's was being accumulated for subsequent submittal for processing in a consolidated, controlled manner. Therefore the intent of Procedure 1.3.8 was never in jeopardy of being violated during this effort. Nevertheless we have reinforced the pertinent requirements of Procedure 1.3.8 via a station memo (#MSG-82-361) as a precautionary measure to ensure that future drawing updates occur.

We believe that the above explanations adequately demonstrate that the situations described in INC-82-04-02 did not constitute an item of noncompliance and request that it be withdrawn.

#### Violation B

10 CFR 50, Appendix B, Criterion V, states that activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances.

Technical Specification 6.8.A states, in part, that written procedures shall be established which meet or exceed the requirements and recommendations of Section 5.3 of ANSI N18.7-1972.

ANSI N18.7 Section 5.3.4 states, in part, that General Plant Procedures provide instructions for integrated operations of the plant, including startup procedures that shall include confirmation that valves are properly aligned.

General Plant Operating Procedure 2.1.11, Revision 2, Section N.A states that valve lineup forms (Appendix A to System Operating Procedures) shall be utilized for conduct of all valve lineups.

Contrary to the above, the following are examples of drawings and procedures not appropriate to the circumstances and not meeting the requirement to confirm that valves are properly aligned.

- 1) Three Piping and Instrumentation Diagrams (P&ID) did not identify thirteen test, vent, and drain (T, V&D) connections existing in safety related piping systems. Instrument Air System drawing M-220 identifies only one header isolation valve inside the drywell when two exist. Three of these T, V&D connections are primary containment boundaries.
- 2) The valve lineup check lists for the four applicable system operating procedures do not identify twenty-two valves associated with the T, confirmed as required.

BOSTON EDISON COMPANY

Mr. Thomas T. Martin, Director  
April 2, 1982  
Page 4

Response to Notice of Violation B (INC-82-04-03)

In response to Item B(1) we wish to point out that test, vent and drain (T, V & D) connections are not required to be shown on P&ID's. Where T, V & D connections do appear on P&ID's they, of course, must be located as shown. Hence, we must take exception to this portion of the item of noncompliance.

We agree that at the time of this inspection, some P&ID's did not reflect as-built plant conditions. As stated in our response to INC-82-04-02, safety system drawings (P&ID's) have been revised to indicate as built conditions.

Item D(2) is also addressed in our response to INC-82-04-02, safety system valve lineup procedures have been revised to reflect as-built system configuration.

Memo MSG-82-361 issued to reinforce the identification, reporting, and correcting of P&ID discrepancies will preclude further violations. We are presently in full compliance.

We believe this submittal satisfactorily responds to the issues identified in Inspection 82-04. Should you require any further information concerning this response after reviewing it, please contact us.

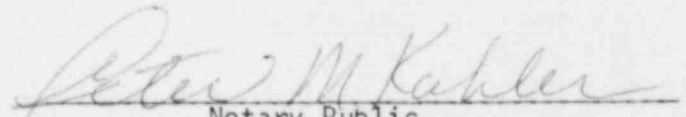
Very truly yours,

  
W. H. Deacon  
Acting Manager  
Nuclear Operations Support

Commonwealth of Massachusetts)  
County of Suffolk)

Then personally appeared before me W. 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: *after 21, 1984*

  
Notary Public