

BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

March 6, 1982
BECO Ltr. #82-71
SVPN 82-20

Richard W. Starostecki, Director
Division of Resident and Project Inspection
Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

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

Subject: Response to Inspections 81-24 and 81-35

Reference: NRC Letter of February 4, 1982 to Boston Edison Company
(BECO Ltr. #1.82.029)

Dear Sir:

In the referenced letter, three violations were identified. Attached to this cover letter are the responses to those items.

In addition, your letter requested Boston Edison to give particular attention to actions precluding recurrence of previously identified items of non-compliance.

Boston Edison shares the concerns of the NRC regarding recurring items of non-compliance particularly if the corrective actions taken were not effective in preventing recurrence. The particular issue involved with the subject inspection deals with a failure to follow specified procedural requirements while work was not being performed on disassembled MSIV's. Specifically, the valve opening should have been covered. That procedural requirement along with another requirement to maintain a tool control log reflects the guidance provided in ANSI N18.7 - 1972 to prevent entry of extraneous material into a closed system.

Regarding the tool control log, it has been concluded that this requirement is impractical for the control of work inside the drywell because of numerous work activities which occur simultaneously. To be totally effective the tool control station would have to be located in the proximity of the MSIV's. Since such a location would violate sound ALARA practices and since it appears that the control log constitutes an unworkable and unnecessary commitment, Boston Edison has chosen to delete this item in the procedure.

ENCLOSURE CONTAINS
SAFEGUARDS INFORMATION

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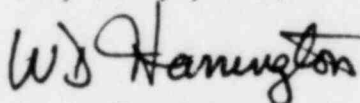
Regarding the failure to cover the openings, Boston Edison believes that the final assurance that the MSIV's do not have any foreign material present is the pre-closure inspections which were performed. Of course this is preceded by utilization of craft personnel who are experienced in maintenance activities of this kind and the requirement to keep foreign material from entering the components.

Boston Edison is committed to following established procedures and is striving to improve both our procedures and their implementation. Consideration is being given to augmenting the housekeeping and cleanliness inspections during those periods when extensive construction is in progress. The details of the nature and frequency of those inspections have not been finalized. The inspections would be intended among other things to identify cleanliness violations of the type associated with the MSIV's and to allow management to take prompt and strong corrective measures.

Regarding your reference to the pending order, Boston Edison shares your concern about the effectiveness of management controls regarding maintenance and security activities. We assure you that due consideration will be given to the problems indicated in your recent inspections. Accordingly, every attempt will be made to ensure that our response plan of action required by the order is sufficiently comprehensive to encompass those problems. Every attempt will be made to encompass the issues in the initial response to the order.

Pursuant to Section (b) (4) of 10 CFR 73.21 we are requesting that you withhold the Safeguards Information provided in this letter from public inspection. Withholding from public inspection does not affect the right, if any, of persons properly and directly concerned with the project to inspect the information.

Very truly yours,



W. D. Harrington

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Attachments

Commonwealth of Massachusetts

Then personally appeared before me William D. Harrington, who, being duly sworn, did state that he is Senior Vice President - Nuclear 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: January 17, 1986


Notary Public