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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

April 26, 1982

BECO. Ltr. #82-108

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

Reference (A) NRC Letter dated April 1, 1982,
IE Inspection 82-11

Subject: Inspection 50-293/82-11

Dear Sir:

This responds to an item of violation contained in Reference (A), the result of a routine safety inspection conducted on February 25-28, 1982 at Pilgrim Nuclear Power Station. Our response to part of the notice is contained in the attachment to this letter.

In Appendix A of Inspection 82-11, you state that, contrary to the requirements contained in Technical Specification 6.8.A and Station Maintenance Procedure 1.5.3, an adjustment was made to the leaking flange without an authorized Maintenance Request (MR).

We agree that, as stated in the text of Inspection 82-11, an adjustment was made to the leaking flange without an authorized MR. However, this lack of an MR was not the result of failure to follow procedures, but was done purposely to preclude authorization of any adjustment or repair to the containment without first quantifying the leakage and having it assessed by the Test Director.

It was also stated in the text, and we wish to reinforce, that the personnel sent to the leak site were given only plastic sheeting and tape, and instructed by the maintenance supervisor to contain the leakage, that is, to funnel the leakage to a floor drain to allow measurement of the leak rate. In addition, the Test Director questioned these personnel regarding their assignment prior to their entering the work area. The Test Director was satisfied that they had received detailed instructions on what they were to do and authorized them to perform the task as described.

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When the subject personnel found it difficult to funnel the leakage as they had been instructed, they decided, without authorization, to adjust the flange in the belief that this would make the funneling easier. To accomplish the adjustment they had to search the Torus area to procure a suitable wrench, which had intentionally not been provided to them to prevent the evolution that their unauthorized actions ultimately developed.

We believe that we exercised every reasonable precaution to ensure compliance with Procedure 1.5.3 and Technical Specification 6.8.A, and that this portion of the violation was the result of personnel acting without authorization and, admittedly unintentionally, obviating a number of precautions we had instituted to prevent what happened.

We would also like to clarify an item contained in Section 5.d.4 (Page 10) of the text of Reference (A). Contained in this section is "Penetration X-255 1301-64 Testable Flange", which is indicated to be Type B testable. This flange is not Type B testable, and we wish this item to be deleted from the list.

We believe this submittal satisfactorily addresses the concerns identified in Reference (A). Please be assured of our willingness to provide any additional information you may need concerning this response.

Very truly yours,

W D Harrington

Attachment

Commonwealth of Massachusetts)
County of Suffolk)

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: *October 21, 1988*

Peter M. Kahler
Notary Public



Attachment to Inspection 82-11 Response

Violation in Appendix A

10 CFR 50, Appendix J, Section III.A.1.(a), states, in part, "During the period between the initiation of the containment inspection and the performance of the type A test, no repairs or adjustments shall be made so that the containment can be tested in as close as the "As is" condition as practical."

Contrary to the above, during the type A test, an adjustment to a leaking flange of the stop check valve on the eight inch RCIC exhaust line was made at 1920 hour, February 25, 1982.

In addition, Technical Specification 6.8.A requires that written procedures shall be implemented in accordance with Sections 5.1 and 5.3 of ANSI N18.7-1972, in which adherence to written procedures are specified; Station Maintenance procedure 1.5.3 requires that a Maintenance Request (MR) Form (Attachment A to the procedure) be used for personnel performing station maintenance.

Contrary to this, on February 25, 1982 an adjustment was made to the leaking flange identified previously without using an authorized MR.

This is a Severity Level IV violation (Supplement I).

Response to Violation (INC 82-11-01)

We have described the evolution of this violation in the cover sheet of this submittal. Our immediate corrective step was to declare the Type A test a failure, thereby increasing the frequency of testing as specified in Appendix J of 10 CFR 50.

To preclude a recurrence we are implementing the following:

- 1.) Personnel involved in critical functions during the performance of the Type A test will receive training/briefing prior to their performing these functions. This will include on-the-spot briefing by the Test Director of any maintenance personnel dispatched to investigate and/or assess leakage.
- 2.) The Type A test procedure (8.7.1.4.) shall be revised to: (a) more strongly emphasize the control required concerning repairs or adjustments to containment during a test; (b) require one of the Type A Test Staff personnel to witness all leakage assessment efforts. This is to ensure that no adjustments or repairs are made without proper authorization (Maintenance Request and Test Director's direction); (c) require that all test related Maintenance Requests issued during the performance of the Type A test shall be reviewed and approved by the Test Director, who is to determine their potential impact on the test.

These revisions shall be completed by July 7, 1982.