

BOSTON EDISON COMPANY  
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WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

May 19, 1982

BECO. Ltr. #82-151

Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
Office of Inspection and Enforcement  
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 29, 1982,  
IE Inspection 82-02 and 82-03

Subject: Inspection 50/293/82-02, 82-03

Dear Sir:

This responds to items of violation contained in Reference (A), the result of routine safety inspections conducted January 11-15, 1982 (82-02) and January 26-29, 1982 (82-03) at Pilgrim Nuclear Power Station. Our response to Items A and C of Appendix A are contained in Appendix A of this response. Appendix B of this response contains a response to the Notice of Violation identified in Appendix B of Reference (A), and, because it is deemed Safeguards Information, we request that this portion of the response be protected against unauthorized disclosure, that it not be placed in the Public Document Room, and that it be distributed in accordance with 10 CFR 73.21(c).

Reference (A) also contains Item B, Appendix A an Item of Non-Compliance (82-02-04) which states that certain of our maintenance activities were not conducted in full compliance with ANSI N18.7-1972 (Section 5.1 and 5.2), specifically that these activities were not accomplished using approved procedures.

Boston Edison has reviewed this item and the activities which led to it, and believe this item of non-compliance to be inappropriate and request that it be withdrawn for the reasons contained in the following narrative.

- Maintenance Request (MR) 81-12-51 was issued to authorize replacement of a portion of the Reactor Water Clean-up System (RWCS), a task that was completed January 13, 1982. The violation states that a procedure was established, in contradistinction to ANSI 18.7 and PNPS Technical Specifications 6.8.A and 6.8.B, by office memorandum M-81-350, which was not reviewed by the Operations Review Committee (ORC) or approved by the ORC Chairman.

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ANSI 18.7-5.2.7 states, in part:

Maintenance or modification of equipment shall be preplanned and performed in accordance with written procedures, documented instructions or drawings appropriate to the circumstances which conform to applicable codes, standards, specifications, and criteria. Skills normally possessed by qualified maintenance personnel may not require detailed step-by-step delineations in a written procedure.

We have reviewed the work performed under MR 81-12-51 and ANSI N.18.7 and believe that those portions requiring skills not "normally possessed by qualified Maintenance personnel" were performed with detailed, written, approved procedures, and a Quality Control plan.

The only element of this task not covered by approved procedures was the placement of the piping in accordance with an isometric. We believe the installation of piping using an isometric to be a skill normally possessed by qualified mechanics; therefore, we do not believe this to be a violation.

- MR 81-23-35 authorized the repair, adjustment and test of the HPCI Turbine Stop Valve Balance Chamber. The Notice of Violation cites Boston Edison for using a procedure established in a vendor service information letter (SIL-352) without review by the ORC or approval of the ORC Chairman.

Boston Edison agrees that this item describes a potential violation. However, when the Inspector identified elements in our intended activities which would lead to a violation, we implemented corrective steps. The scope of work was reviewed as the Inspector suggested, and those elements requiring ORC approval were incorporated into an ORC approved temporary procedure, T.P. 82-17 "HPCI Turbine Stop Valve Balance Chamber Adjustment". Compliance was achieved before a violation occurred.

We recognize that this event was avoided by the Inspector's efforts; therefore, to preclude recurrence of the evolution that led to this situation, ORC training has been given to the Chief Maintenance Engineer and Staff Engineer. This training clarifies the criteria involved and responsibilities concerning ORC review.

We believe that, because the procedure was written as suggested by the Inspector, and because the test was therefore conducted in accordance with an approved procedure, this portion of Violation B did not take place and should be withdrawn.

- MR 80-1589 authorized the replacement of the piston seal in the hydraulic cylinder which actuates the HPCI Turbine Stop Valve with a new seal of a different material. Boston Edison is cited for performing this replacement with a procedure established by a vendor service information letter, SIL-306, which had not been reviewed by the ORC or approved by the ORC Chairman.

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MR 80-1589 did, in fact, authorize such a replacement, and the replacement material was ordered and supplied in accordance with the Boston Edison Quality Assurance Manual (BEQAM). Documentation was supplied which ensured that the material/component met or exceeded the design requirement, and was therefore not a modification requiring ORC review.

The actual installation of the replacement seal was performed in accordance with an existing PNPS procedure. Instructions to qualified maintenance personnel "appropriate to the circumstances" were provided in accordance with ANSI 18.7-5.2.7.

For these reasons we believe the activity cited was inappropriately designated a violation and should be withdrawn.

We believe this submittal satisfactorily addresses the concerns identified in IE Inspection 82-02 and 82-03. Please be assured of our willingness to provide any additional information you may desire concerning this response.

Very truly yours,

*W D Harrington*

Attachments

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

IE Inspection 82-02

Appendix A

Item A, Appendix A

10 CFR 50, Appendix B, Criterion XII states, in part, "Measures shall be established to assure that...gauges /and/ instruments...used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."

Boston Edison Company Quality Assurance Manual (BEQAM) Volume II, Section XI, Test Control, Paragraph 11.5.5 states in part that personnel shall assure that equipment and instrumentation utilized in performing periodic surveillance tests are calibrated.

Contrary to the above, Surveillance Tests 8.M.3-11.1 through 8.M.3-11.4, "RPS Instrument Channel Response Time Channel A1, B, C1 and D1 with Reactor Mode Switch in the Run Position," required by the Technical Specifications, were performed on February 20, 1981 using an uncalibrated brush recorder to measure RPS response time.

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

Response to Item A (INC 82-02-03)

Our immediate corrective action was to recalibrate the Gould Brush Recorder, serial number 04565, using a cycle generator and in accordance with an approved PNPS procedure. This calibration verified the accuracy of the data collected during the "RPS Instrument Channel Response Test" performed February 20, 1981.

To prevent recurrence, a procedure is being prepared that shall require the calibration of the brush recorder with a cycle generator prior to the performance of this surveillance. It will therefore be unnecessary to "control" this instrument, or to calibrate it by the currently designated schedule, because data accuracy will be assured by the pre-surveillance calibration.

Full compliance shall be achieved by June 29, 1982.

Item C, Appendix A

Technical Specification 6.8.A states, in part, that written procedures shall be established implemented and maintained.

Pilgrim Nuclear Power Station Procedure 3.M.2-7, Instrument Maintenance, Section II requires that, the instrumentation loops, as outlined in the procedure are to be checked once per cycle (18 months) and those instrument loops found to be in need of calibration be reassigned for calibration.

Contrary to the above, as of January 15, 1982, Procedure 3.M.2.7 was not fully implemented, in that the following instrumentation loops outlined in Procedure 3.M.2.7 were not checked or calibrated once per cycle (18 months):



- Reactor Building Closed Loop Cooling Water Controllers, TIC 3835 and TIC 3836 were last calibrated in November, 1971.
- Recirculation System Controller, TIC 262-22 was last calibrated in November, 1979.
- Residual Heat Removal System Flow Indicator, FI 1040-14-1 and Flow Transmitter, FT-1001-86 were last calibrated in March 1971 and September 1972, respectively.
- Feedwater System Controllers, FIC 640 and FIC 618 were last calibrated in 1979.

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

Response to Item C (INC 82-02-01)

Our immediate corrective step was for the Instrument and Control (I&C) group to begin researching the entire list of instruments contained in Station Procedure 3.M.2-7. The object of this research was to categorize instruments according to plant system, and to create a category of instruments considered "balance of plant" instruments.

To prevent recurrence, a plan was developed and implemented which, using the information developed by the categorization effort, incorporates instruments found to be on a system with an existing 8E (once a cycle) procedure into that procedure. Instruments found on a system with no 8E requirement will be incorporated into a new series of procedures, designated 8F. These new series of procedures (8F) are designed to accommodate instruments that are determined to be "balance of plant" instruments. An instrument contained in 8F procedures will be calibrated when it is found to be out of calibration by normal operational observation, or when calibration is determined to be necessary by the I&C Engineer. These procedures will also outline the calibration of the incorporated instruments.

We believe the type of plan we have developed will correct the problem of the calibration of instruments in a comprehensive way, under the guidelines of a station procedure.

The final implementation of this plan requires the revision of many 8E procedures and the creation of a number of new 8F procedures. We have completed the categorization effort, and are now in the process of developing and emplacing the procedures.

We shall reach full compliance by August 31, 1982.

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