



10 CFR 2.201

**BOSTON EDISON**

Pilgrim Nuclear Power Station  
Rocky Hill Road  
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June 30, 1994

E. T. Boulette, PhD  
Senior Vice President - Nuclear

BECO Ltr. #94-076

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

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

Subject: RESPONSE TO NOTICE OF VIOLATION

Reference: NRC INSPECTION REPORT NO. 50-293/94-09

Please find enclosed the response to the Notice of Violation contained in the referenced Inspection Report.

Please contact me if there are any questions regarding this response.

*E.T. Boulette*

E.T. Boulette, PhD

Enclosure  
PMK/lam/9471

Then personally appeared before me, E. T. Boulette, who being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company 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:

4/15/99  
DATE

*Maureen J. L. L...*  
NOTARY PUBLIC



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ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION

BOSTON EDISON COMPANY  
PILGRIM NUCLEAR POWER STATION

DOCKET NO. 50-293  
LICENSE NO. DPR-35

Notice of Violation

During an NRC inspection conducted April 5, 1994 to May 9, 1994 a violation of NRC requirements was identified and documented in Inspection Report (IR) 50-293/94-09. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 6.8.A requires that written procedures and administrative policies be implemented that meet or exceed the requirements and recommendations of Sections 5.1 and 5.2 of ANSI 18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33. Specifically, Appendix A.1.1 to USNRC Regulatory Guide 1.33 provides that administrative procedures should be established to implement plant fire protection programs.

Pilgrim Nuclear Power Station Procedure 8.B.14, "Fire Protection Limiting Conditions for Operation and Compensatory Measure Fire Watch Requirements," Sections 7.1.1 and 7.1.2 direct that when confronted with a fire barrier in a degraded or inoperable condition, review Final Safety Analysis Report (FSAR) Section 10.8, and within one hour establish the appropriate fire watch.

Contrary to the above, on May 5, 1994, the inspector observed two fire doors in the salt service water rooms located within the intake structure that had been blocked in the open position in excess of one hour without proper fire watches being established. Additionally, subsequent to this occurrence, the licensee identified several other instances in which fire watches were not established as required when fire doors were found or made to be inoperable or when a vehicle was parked in the reactor building trucklock.

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

Reason for the Violation

This violation was caused by two factors: (1) human performance, and (2) lack of procedural clarity/instruction detailing where compensatory measures are required.

In the case of the two fire doors in the salt service water rooms being blocked open, personnel could not identify the requirements concerning compensatory measures to be taken when fire barriers are breached. This aspect of the violation was due to human performance.

The several instances we identified of cases when fire watches were not properly established was due to a lack of procedural clarity/instruction. Specifically, the procedures did not contain a comprehensive definition of what constitutes a blocked open door, and did not contain a comprehensive list of fire/smoke doors in the plant identifying the necessary compensatory actions (hourly or continuous fire watch) to aid in the identification/assignment of a fire watch.

The failure to post a fire watch while a vehicle was parked in the reactor building trucklock resulted from a lack of clear procedural instruction that (1) the vehicle itself (unloaded/empty) is a transient combustible and (2) the reactor building inner trucklock door is not considered a fire barrier.

#### Corrective Steps Taken and Results Achieved

Our immediate corrective action was to close the subject fire doors or post fire watches. A fire watch was posted for the vehicle parked in the trucklock. On May 10, 1994 the Maintenance Section discussed the incident to reinforce the importance and nature of fire protection requirements. Mechanical Maintenance Supervisors have been counseled on their responsibility to ensure fire watches are in place whenever a Fire Door is blocked open. Clarification was made not to assume a security guard in the area satisfies the requirement for a fire watch. Guidance was provided to craft personnel and their supervisors on fire door requirements. Security personnel were briefed on the incident and reviewed the specific requirements of their responsibility as fire watches.

Other actions taken include: (1) a Nuclear Organization, "For Your Information", newsletter was issued on May 16, 1994 to reinforce fire door requirements (Pilgrim's General Employee Training (GET) addresses fire doors and contains questions to ensure personnel are aware of fire door requirements); (2) a portion of the May 26, 1994 Monthly Plant Safety meeting discussed the topic of fire doors, and provided better definition on what constitutes blocking open a door.

We have placed warning signs in the reactor and turbine building trucklocks that specifically communicate the need to establish fire protection compensatory measures prior to bringing in vehicle(s) and other combustibles. The radwaste trucklock is exempted from similar requirements because it has full fire suppression and detection systems.

A Fire Protection representative now attends the daily 0715 production meeting to provide increased fire protection involvement in the day's scheduled activities and to allow the representative to be aware of any activities having the potential for impacting the fire protection program or implementation of program required actions.

No further violations have been identified since these immediate corrective steps have been implemented.

#### PROCEDURAL CHANGES MADE TO PRECLUDE FURTHER VIOLATIONS

Procedure 8.B.14 (Rev. 17), "Fire Protection Limiting Conditions for Operation and Compensatory Measure Fire Watch Requirements", has been revised to provide:

- A comprehensive, stand alone matrix of fire doors/smoke doors and a related listing of LCO and compensatory measure fire watch requirements should such a door be disabled or blocked open.
- A definition of what constitutes a "blocked open" door.
- Specific requirements for fire watches for motor vehicles entering the Process Buildings and/or trucklocks.

Procedure 1.4.3 (Rev. 19), "Combustible Controls for PNPS", has been revised to include specific requirements for combustible permits for all motor vehicles entering the Process Buildings.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Our immediate corrective actions have achieved full compliance. The changes to Procedures 8.B.14 and 1.4.3 were approved June 23, 1994.