

BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

December 14, 1982

BECO. Ltr. #82-313

Mr. Richard W. Starostecki, Director
Division of Project and Resident 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

Response to Inspection 82-24

Ref. (A): NRC letter dated November 12, 1982,
titled "Inspection 50-293/82-24"

Dear Sir:

The referenced letter contained one item of deviation. Our response to that deviation is presented as follows:

Notice of Deviation

Boston Edison Company (BECO) letter (BECO Ltr. #82-12) dated January 15, 1982 to NRC Region I in response to Inspection Report 50-293/81-19 regarding radioactive discharges stated that: 1) a sign had been made to install on the ampere meters for the circulating water pumps to preclude a shutdown of the pumps during a radioactive discharge, 2) Procedure Nos. 7.9.2 and 2.1.17 would be reviewed and revised, where necessary, to address proper use of the above-mentioned sign, and 3) these revisions would be implemented prior to startup.

Contrary to the above, as of September 23, 1982: 1) the sign to preclude shutdown of the circulating water pumps during a radioactive discharge was not available, 2) Procedure Nos. 7.9.2 and 2.1.17 did not address proper use of the sign, and 3) revisions were not implemented prior to startup in March, 1982.

Response

Upon notification by the inspector of the missing sign, another was immediately made available. To prevent future misplacements of the sign, a newly designed sign was fabricated and made available on December 1, 1982, to replace the previous types which were not aptly suited for storage during periods of non-use. The new design is less conspicuous and distracting for periods of non-discharge, easily stored, and more appropriate for use during discharge.

8212290433 821223
PDR ADOCK 05000293
Q PDR

BOSTON EDISON COMPANY

Mr. Richard W. Starostecki, Director
December 14, 1982
Page 2

Also, Procedure Nos. 7.9.2 and 2.1.17 were revised on November 17, 1982, to contain similar language pertaining to discharges and address the proper use of the sign.

We believe that this item of deviation stemmed from an inadequate review of the corrective actions taken in response to the original item of non-compliance (81-19-02). As a result, guidance has been provided to the Licensing and Compliance staff, outlining a review process for corrective actions. Our goal is to fine tune this process and have it formally addressed in a Nuclear Operations Procedure (NOP). As such, these actions will be finalized in conjunction with the Nuclear Operations Support Department re-organization efforts outlined in Section II of the Boston Edison Company Performance Improvement Program.

We believe these planned actions will adequately resolve this issue and welcome any comments or suggestions to this end.

Very truly yours,

W. S. Harrington