

BOSTON EDISON COMPANY
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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

April 27, 1983
BECO Letter No. 83-102

Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

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

Subject: Inspection 83-03

Reference: NRC Letter to Boston Edison, dated March 29, 1983.

Dear Sir:

This responds to three violations identified during a routine safety inspection conducted between January 25, 1983 and February 25, 1983, and communicated to Boston Edison in Appendix A of the reference.

Notice of Violation A (INC 83-03-02)

Technical Specification 6.8 and Regulatory Guide 1.33 require implementation of procedures for process radiation monitoring system operation. Licensee Procedure 2.2.57, Revision 5, Reactor Building Closed Cooling Water (RBCCW) Process Radiation Monitoring System, requires that a sample of the RBCCW be taken and counted each shift when the monitoring system is out of service.

Contrary to the above, during the period February 8-16, 1983, the RBCCW Loop "B" process radiation monitoring system was out of service and samples were not taken nor counted each shift.

Response

Our immediate corrective action, and to preclude recurrence, was to counsel operations personnel (Nuclear Watch Engineers and Nuclear Operations Supervisors) on procedural adherence. This counselling was completed on February 28, 1983.

In addition, a memorandum, CR 83-39, was issued by the Chief Operations Engineer to all operations personnel indicating the seriousness on non-adherence to procedures, and specifying actions to be taken when any system or system component is declared inoperable. This was completed on February 28, 1983.

Full compliance was achieved on March 1, 1983.

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Notice of Violation B (INC 83-03-08)

10CFR50, Appendix B, Criterion II, and Technical Specification 6.4 require a program for personnel training to assure that suitable proficiency is achieved.

The Pilgrim Nuclear Power Station Training Manual, Revision 3, Section 3.1.1.1.2, requires all Nuclear Operating Supervisors and all Nuclear Watch Engineers to complete training certification forms O-3A and O-3B respectively.

Contrary to the above, on February 22, 1983, station management failed to assure that training certification was complete, in that, two personnel were assigned to positions of Nuclear Operating Supervisor and Nuclear Watch Engineer, prior to the completion of training certification forms O-3A and O-3B respectively.

Response

A review of all O-3A and O-3B forms has been initiated by the Nuclear Training Department (NTD) to identify and correct any further omissions.

This action was completed by April 18, 1983.

To preclude recurrence, regular meetings between NTD and the Nuclear Operations Department have been initiated to provide and promote better coordination of activities related to Operations training.

A Qualification Matrix System and appropriate procedures are being developed. These will show the qualifications of individual positions, and of the personnel occupying those positions. This is to be completed by January 1, 1984.

The expected date for full compliance is January 1, 1984.

Notice of Violation C (INC 83-03-04)

Technical Specification 6.8.A states that "Written procedures ... shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 ..." ANSI N18.7-1972, Section 5.1.5 requires procedures for the control of equipment to maintain reactor and personnel safety.

Station Procedure No. 1.4.8, Hazardous and Restricted Material Control, Revision 6, requires (1) that when cylinders are not in use, the protective caps will be installed, and (2) that cylinders shall be contained in approved carts or securely held by safety chains.

Contrary to the above, the licensee failed to control hazardous material as evidenced by the following:

- On February 4, 1983, a high pressure nitrogen cylinder was stored in Reactor Building Fan Room No. 5 without a protective cylinder cap installed, and

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- On February 16, 1983, a high pressure nitrogen cylinder was in use in the reactor building and was neither in an approved cart nor securely held by a safety chain while in the upright position.

Response

A memorandum, AD 83-38, was issued by the Station Manager to the Chiefs and Group Leaders specifying new restrictions and requirements regarding the use of high pressure gas cylinders within the process buildings, including the following:

- o Restraining of cylinders where they are required for use on a continuous basis.
- o Restraining of cylinders when used for temporary purposes.
- o Administrative controls for use of cylinders for temporary purposes.
- o Administrative controls for the storage of spare cylinders.

The memorandum also stated that the new restrictions, together with those already specified in existing station procedures, shall be applied to cylinder usage and handling.

This was completed March 2, 1983.

A revision to Station Procedure 1.4.8, Hazardous and Restricted Material Control, has been initiated to incorporate the new restrictions and requirements outlined above.

This shall be completed by June 1, 1983.

Full compliance will be achieved on that date.

We believe this submittal satisfactorily addresses the issues identified in IE Inspection 83-03. Should you have any questions concerning this response, please contact us.

Very truly yours,

W.D. Harrington

Commonwealth of Massachusetts)
County of Suffolk)

Then personally appeared before me W.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

