

BOSTON EDISON COMPANY
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

July 6, 1983

BECO Ltr. #83-170

Thomas T. Martin, Director
Division of Engineering and
Technical Programs
U. S. Nuclear Regulatory Commission
Region 1
531 Park Avenue
King of Prussia, PA 19406

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

Subject: Inspection 83-08

Reference: NRC Letter to Boston Edison, dated June 13, 1983

Dear Sir:

This letter responds to the two violations identified during a routine safety inspection conducted between May 9, 1983 and May 13, 1983 and communicated to Boston Edison Company in Appendix A of the reference.

Notice of Violation A (INC 83-08-01)

- A. Section 6.5.B.8.a of the PNPS Technical Specifications requires that the conformance of facility operation to provisions contained within the Technical Specifications be audited under the cognizance of the NSRAC at least once per year.

Contrary to the above, activities carried out under Sections 3.8.D and 4.8.D of the Technical Specifications were not audited from December 31, 1981 to May 13, 1983 as required.

RESPONSE

The immediate corrective action taken was to conduct a review of all Technical Specification audit commitments to determine if any other audits had not been performed. The review indicated that two other audits (Chemistry and Reactor Engineering) under the cognizance of the NSRAC, were not conducted as required in 1982. The three NSRAC audits, including the one referenced in INC 83-08-01, were rescheduled and completed as of June 1, 1983.

To prevent recurrence, the Quality Assurance Department master schedule for 1983 and 1984 audits was reviewed to assure that audits required to be performed under the cognizance of NSRAC are scheduled in conformance to requirements of the Technical Specifications.

Full compliance was achieved on June 2, 1983.

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Mr. Thomas T. Martin, Director
July 6, 1983

Page 2

Notice of Violation B (INC 83-08-04)

- B. Section 6.9.C.2.a of the PNPS Technical Specifications requires that a report on the radiological environmental surveillance program for the previous 12 months of operation shall be submitted to the Director of the NRC Regional Office as a separate document within 90 days after January 1 of each year.

Contrary to the above, the report for 1982 was not submitted within 90 days of January 1, 1983 as required.

RESPONSE

The immediate corrective action taken was to expedite reproduction of the subject report, and upon completion, submit the report to the Director of the NRC Regional Office. This action was completed on May 9, 1983.

To preclude recurrence, a proposed amendment to section 6.9.C.2 of the PNPS Technical Specifications had been previously submitted to the Commission on April 15, 1983. The proposed change is to reschedule the required report submittal date to, "prior to May 1" of the following year. This change, if approved, will provide a more realistic time frame for preparation, approval and reproduction of the subject report.

In addition, the Nuclear Management Services Manager, has issued a memorandum to the involved parties instructing said parties to allow for sufficient review and reproduction time when developing this annual report for issuance.

Full compliance was achieved on May 9, 1983.

BOSTON EDISON COMPANY

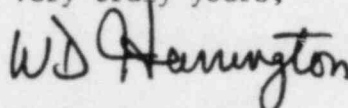
Mr. Thomas T. Martin, Director
July 6, 1983

Page 3

We believe this submittal satisfactorily addresses the two items of non-compliance identified in IE Inspection Report 83-08.

Should you have any questions concerning this response please do not hesitate to contact the undersigned.

Very truly yours,

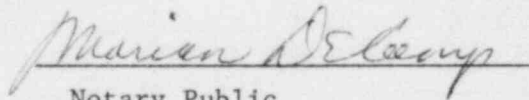


W. D. Harrington

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: 4/14/89


Notary Public