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February 2, 1995
BECo Ltr. #95- 010

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

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

Detailed Control Room Design Review Project (DCRDR)

Boston Edison committed (in Reference 1) to inform NRC of instances in which our actual corrective actions for the Detailed Control Room Design Review Project (DCRDR) differed substantially from those reported in the Final Summary Report (Reference 2). In the course of a verification activity described in our Program Plan (Reference 3) and conducted in early December 1994, we identified several such instances in addition to those reported in previous correspondence.

1. HED (Human Engineering Discrepancy) #4B191: In the Final Summary Report (Ref. 2), we stated we would install switches in the control room to enable operators to secure the drywell fans because the Emergency Operating Procedure (EOPs) called for that action and it would be difficult to do with existing controls (outside the control room). Instead of performing the planned modification, we performed an analysis that showed that the drywell fans need not be secured after an accident. The EOPs (EOP-03) were changed to delete the requirement to secure the fans.

2. HED #4B210: In Reference (2) we stated our intention to rewire the position indicating lamps for the HPCI and RCIC turbine stop and governor control valves. This modification was performed on the HPCI turbine stop valve and on the HPCI and RCIC governor control valves. Because of physical limitations of the valve position limit switches, we were unable to perform this modification on the RCIC turbine trip/throttle valve.

3. HED #5B062: In Reference (2) we stated our intention to replace four (4) meters and one counter with black faces, which did not conform to the standard format of black printing on a white face. Further review indicated that the four black-faced meters have a distinct function, that the black faces help operators to locate them amongst the otherwise similar meters, and that the faces are sufficiently readable. Therefore, the four meters were left as is. The counter was found not cost-effective to change; operators reported no difficulty with reading the counter.

4. HED #5B067: In Reference (2) we stated our intention to relocate the first point heater outlet valve control switches from control panel C4 to panel C1. Operator input to design work showed that the switches would be more effective on panel C905, and they were moved there. (Both panels are in the main operating area.)

5. HED #5B111 and HED #5B192: In Reference (2) we stated our intention to add colored zones to selected meters and recorders, if appropriate (we did not commit to installation of colored zones on specific devices). After extensive review and evaluation by the operations group, we determined that the existing scale markings are adequate and no colored zones were installed.

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6. HED #5B170 and HED #5B183: In Reference (2) we stated our intention to revise an Emergency Operating Procedure (EOP-04) to address concerns relating to the lack of certain Area Radiation Monitor (ARM) data in the control room. Further review showed that existing procedures are adequate and no revisions were required. (HED #5B183 appears to have been based on an erroneous conclusion that a certain point was not alarmed, whereas it is.)

7. HED #5B195B and HED #5B199: In Reference (2) we stated our intention to revise EOPs to use rounded-off parameter values (reactor pressure and area temperatures, respectively) that could more easily be determined from existing instruments, rather than odd intermediate values. In one case (out of several) in HED 5B195B and in all cases for 5B199, the EOPs were not revised because the EOPs call for action to be taken before the stated value is reached. Therefore the EOPs are acceptable as is.

8. HED #5B200: In Reference (2) we stated our intention to revise EOP-5 to avoid intermediate values of drywell water level that cannot be read directly from the main control room. Further review showed that there is no need to revise the EOP. An operating procedure (5.3.2.7) provides a method to calculate the drywell water level from existing instruments, throughout the range needed. The procedure is straightforward and would be used under slowly-changing conditions. Therefore no further action is required.

In the case of items 1-4 above, the action taken addresses the HEDs. In the case of items 5-8, it was determined that the planned corrective action was either not needed or was not cost-effective. In all instances, the HED has been verified complete and closed, in accordance with the verification process described in our DCRDR Program Plan.

All committed CRDR corrective actions have now been completed with the following exceptions:

a.) Replacement of the annunciator is underway and will be completed in RFO 10, as previously committed (involves 30 HEDs).

b.) HED #4C091 -- This HED identified control switches that were associated with Control Rod Drive (CRD) stabilizing valves, which were to have been abandoned and removed. The switches have not been removed because we decided to restore the valves. The HED will remain until the valves are restored, which is not yet scheduled. (Valve restoration is included in LTP item 126, Valve Betterment).

c.) HED #AB051B -- During the December 1994 verification process we identified four control switches that had been inadvertently omitted from the switch program. These switches are to be rewired so that their positions conform to our control room standard. Rewiring these switches requires an outage, and they are scheduled for work in RFO 10.

If you have any questions on any of these items, please feel free to contact Mr. Peter Kahler at (508) 830-7939

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ETB/DB/nas/Rap94/DCRDRLtr

References: (1) Telephone conversation among NRC (R. Eaton, J. Bongarra, J. DeBor, R.J. Eckenrode) and Boston Edison on January 31, 1991.

(2) DCRDR Final Summary Report, November 1990, submitted by Boston Edison letter BECo 90-147 dated November 30, 1990.

(3) DCRDR Program Plan Rev. 2, July 1989, forwarded by Boston Edison letter BECo 89-112 dated July 24, 1989

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