

BOSTON EDISON COMPANY  
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

January 3, 1984

BECO. #84-001

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

Subject: Inspection 83-23

Reference: NRC letter to Boston Edison Company dated December 8, 1983

Dear Sir:

This letter is in response to two (2) violations identified during a routine safety inspection of plant operations conducted by Mr. J. R. Johnson of your office on October 4 to November 7, 1983 and communicated to Boston Edison Company in Appendix A of the Reference.

Notice of Violation A. (INC 83-23-01)

10 CFR 50.55a (g), Section XI of the ASME Boiler and Pressure Vessel Code and the NRC letter to Boston Edison Company dated August 15, 1979 require implementation of Boston Edison's proposed in-service testing program for pumps and valves.

Boston Edison Company's Proposed Valve and Pump Testing Program dated April 13, 1979, Table B-6 (Category C valves, EF-2) requires that the High Pressure Coolant Injection (HPCI) System injection check valve (2301-7) be exercised (full stroke) for operability during the cold shutdown mode. Table B-6 further requires that for Category C check valves, the function of which is to prevent reverse flow, the test will be performed to prove that the disc travels to the seat promptly on cessation or reversal of flow.

Station Procedure 8.I.13, HPCI System Check Valve 2301-7 Operability, Revision I, references ASME Section XI, IWV 3520.b, and requires functional testing during each cold shutdown, or in the case of frequent cold shutdowns, during each nine month interval.

Contrary to the above, between March 31, 1982 and November 1, 1983, the HPCI System check valve 2301-7 was not functionally tested at nine month intervals (cold shutdowns occurred during October and November 1982, and June and August 1983). Furthermore, procedure 8.I.13, performed on

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March 31, 1982, did not include a test to prove that the disc travels to the seat promptly on cessation or reversal of flow.

Response

The station procedure used to implement that part of the IST Program applicable to the HPCI System check valve (2301-7) is being revised to include positive verification that the disc travels to the seat promptly on cessation or reversal of flow.

With regard to the test frequency, the procedure is also being revised to specify a frequency in accordance with the requirements of the second 10 year interval IST Program, namely, once per refueling outage. The program was submitted to the Commission by letter dated July 11, 1983; Title: Revised Inservice Testing Program for Pilgrim Station. The expected date for issuance of the revised procedure is February 15, 1984.

Full compliance will be achieved with the successful performance of the next test which will be scheduled to occur during power raising operations following completion of the current refueling outage (RFO #6).

Notice of Violation B. (INC 83-23-03)

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by and accomplished in accordance with procedures. Boston Edison Quality Assurance Manual, Section 7 states that commercial items may be purchased with assurance of quality, and that these items are specified in a Nuclear Operations Procedure which is approved by QAD.

Boston Edison Q-List, Revision E5, Section V, provides a list of items established by the Nuclear Engineering Department as being of simple design, non-engineered, Commercial Quality Control Items yet still essential for the proper operation of safety related systems.

Contrary to the above, as of September 30, 1983 a Nuclear Operations Procedure specifying requirements for procurement of commercial items for use in safety related systems was not established or approved by QAD. Furthermore, on September 30, 1983 a solenoid coil for a safety related system (HPCI remote trip solenoid valve) was procured as a commercial item and installed without being in the approved Section V of the Q-List.

Response

The solenoid coil for the HPCI remote trip valve has been identified as a commercial quality control item and added to the Q List, Section V.

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To preclude recurrence, the following actions have been or are being taken:

The BEQUAM II, Section 7, has been revised to replace reference to a NOP with reference to the Q-List Manual, Section V. In addition, BEQUAM II, Section 4, is being revised to describe the process for CQCI procurement. The revisions were issued by December 30, 1983.

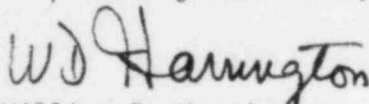
A NOP is being prepared which will establish the requirements for CQCI procurement and will include the requirement for preparation of a specification for procurement of each CQCI. The scheduled date for issuance is January 31, 1984.

The appropriate QAD procedure has been revised to provide instructions to ensure Q items and services are not procured as CQCI unless approved for inclusion in the Q-List, Section V. As an interim measure, pending issuance of the revised procedure, a memorandum was issued to appropriate QAD personnel giving specific instructions for procurement document review. The revised procedure was issued on December 30, 1983.

Full compliance will be achieved with the issuance of the NOP on January 31, 1984.

If you have any questions or concerns regarding the above response, you are requested to direct them to the undersigned.

Respectfully submitted,

  
William D. Harrington

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