

BOSTON EDISON COMPANY
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

November 18, 1983

BECO Ltr. #83-288

Richard W. Starosteck, Director
Division of Project and Resident Programs
U. S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

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

SUBJECT: INSPECTION 83-19

Reference: NRC Letter to Boston Edison Co. dated October 27, 1983

Dear Sir:

This letter is in response to two (2) violations identified during a routine safety inspection conducted by Messrs. J. Johnson and H. Eichenholz of your office on August 16, 1983 to October 3, 1983 and communicated to Boston Edison Company in Appendix A of the reference.

Notice of Violation A. (INC 83-19-02)

10 CFR 50, Appendix B, Criterion II, requires that the quality assurance program be carried out by documented policies and procedures. The Boston Edison Quality Assurance Manual, Section 2, Revision 11, states that the quality assurance program conforms to NRC Regulatory Guide 1.33, Revision 2. Regulatory Guide 1.33, Revision 2, Section C.5, requires periodic review and updating of Special Orders.

Contrary to the above, as of September 12, 1983, periodic review and updating of Special Orders had not been performed. The oldest active entry was dated October 8, 1981. Furthermore, the governing procedure, No. 1.3.2, Special Orders, Revision 8, did not require periodic reviews.

Response

The immediate corrective action taken was the performance of a Special Order Book review which resulted in the retirement or updating of those Special Orders which were determined to be no longer valid or appropriate. This action was completed on September 20, 1983.

To preclude recurrence, the Special Order procedure is being revised to include specific requirements regarding review of the Special Order Book.

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Full compliance will be achieved with the issuance of the revised procedure, which is scheduled to occur on January 15, 1984.

Notice of Violation B. (INC 83-19-01)

Technical Specification 4.5.H. Maintenance of Filled Discharge Piping, requires that the discharge piping of the Core Spray system be vented from the high point.

Contrary to the above, as of September 28, 1983, the discharge piping of the Core Spray system was not vented from the high point, but was vented from the drain valves on the piping.

Response

To ensure compliance with the Technical Specification section 4.5.H and station procedures, and to preclude recurrence of improper venting, a memorandum was issued to operating personnel specifying that all venting of high integrity piping for keep-fill checks is to be done at the high point vents and not the high point drains.

Full compliance was achieved on October 14, 1983.

Review and Evaluation of Events

The reference letter to Boston Edison Company also requested details of actions planned to improve the review and evaluation of events for reportability.

Response

Prior to the event noted in paragraph 4.A.(4) of Inspection Report 83-19, station personnel had performed a review of the station procedure for the processing of Failure and Malfunction Reports and determined that a procedure change would be necessary. A revision has been completed and was approved by the Operations Review Committee on November 9, 1983 to effect a more expeditious review and evaluation of events for reportability.

If you have any questions on the above responses, please direct them to the undersigned.

Very truly yours,

W.D. Harrington

William D. Harrington

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