

Enclosure 4

BOSTON EDISON COMPANY  
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WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

October 11, 1983

BECO 83-250

Mr. Richard W. Starostecki  
SALP Board Chairman, 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

Response to Systematic Assessment of Licensee Performance (SALP)

Dear Sir:

It is the goal of the Boston Edison Company management to achieve excellence at all levels in all functional areas. A key indicator which we use to measure this achievement is the category level of performance designated by the SALP Board review.

We believe we have shown improvements in all the functional areas and this is supported by your rating of an overall satisfactory performance level with respect to operational safety. Further, it is our opinion that significant improvements have taken place in the areas of Maintenance and Licensing Activities such that these areas should have been categorized as Level 1.

This became more evident to us during our meeting on September 21, 1983 in which we discussed your assessment process, the criteria used to arrive at the conclusions, and required actions to move these areas into the Category 1 rating. Of particular concern to Boston Edison is the use of events which occurred prior to this assessment period, as examples of observed weaknesses in performance. Although the resolution of these events carried over into this assessment period, we wish the practice of using older problems to judge current performance was not selected. The fact that they were resolved in this assessment period should have been reflected as a positive improvement in performance level in these areas.

We agree with your summation that an improved staff attitude is in evidence and the Management commitment to provide the required resources to achieve assigned departmental goals will continue in the future.

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We wish to point out that similar achievements were observed by another regulating body, the Massachusetts Department of Public Utilities (MDPU). The MDPU has set performance goals for Boston Edison in the following areas which were all met or exceeded by Pilgrim: Availability Factor, Equivalent Availability Factor, Forced Outage Rate, Capacity Factor, and Heat Rate.

Additionally, consistent with our commitment to achieve excellence in our performance, we will continue to focus management attention on the operator training program, the procedure update program, and the stressing of adherence to established policies and procedures by all personnel.

Finally, we wish to make it clear that we are providing comments and information not to take issue with your findings, but rather, because we believe it is essential that you understand our perceptions of how and why our future actions are being planned to achieve improved performance. Boston Edison is committed to a program to achieve excellence and if you conclude that any information contained herein indicates we are not proceeding in that direction, then we wish to have further discussions with you.

We have provided specific comments pertaining to the functional areas in the attachment. Should you wish to discuss these issues further, please do not hesitate to contact us.

Very truly yours,

*W D Harrington*

JDK/mat

## ATTACHMENT

### PLANT OPERATIONS

Boston Edison concurs with the NRC's conclusion that performance in the plant operations area has improved and agrees that increased management attention is needed in some aspects of data/information recording, gathering, review and evaluation. Increased attention will be given to these matters. Boston Edison wishes to point out that several corrective actions have been implemented, and their effectiveness will be monitored over the next several months. Some of these actions include:

- o the issuance of a Nuclear Operation Procedure (NOP) which addresses shift records;
- o the use of a more comprehensive shift turnover sheet;
- o the establishment of six (6) Administrative Assistants to improve the quality of paperwork in the Control Room and to promptly assemble pertinent data immediately following a transient or off-normal operating condition;
- o the reinforcement of management policy to provide a greater level of detail in the operating log.

Further, substantial progress has been made to resolve the recorder chart problem:

- o We are in the process of reviewing and updating recorder chart needs to ensure proper charts are installed and continue to be available.
- o Approximately ten (10) recorder units will be replaced during the upcoming refueling outage with units of higher reliability;
- o The Nuclear Watch Engineers have been reminded to ensure that all Control Room chart recorders are operating properly each shift.

Please be assured that in the "open" LER area, continued management attention will be provided to close out this backlog and assure evaluations of future events when required.

To improve the cooperation and communications between personnel in the Quality Assurance, Operations, and Maintenance Departments, senior management instituted on July 28, 1983, a weekly interface meeting. An industrial psychologist, from the firm of Rohrer, Hibler, & Replogle, Inc., occasionally attends these meetings and suggests methods and techniques that could be employed by the attendees to facilitate interface relationships. Although it is too early to ascertain the benefits of this program, preliminary comments by attendees have been favorable. We plan to continue periodic meetings as needed to improve co-operation between Quality Assurance Department and Pilgrim Station personnel.

As you noted, BECo's independent appraiser (MAC) has recommended additional QA/QC surveillance of selected PNPS activities.

QAD currently has a program for conducting surveillance inspections at PNPS; this program is described in QAD Procedure 10.03, "Conduct and Reporting of Surveillance Inspections." The scope of activities covered by this procedure will be expanded and the scheduling of inspections will be formalized.

To assist in these efforts, QAD has obtained copies for review of similar surveillance and monitoring programs currently in use at three operating nuclear plants; which are reported to be among the best in the industry. It is anticipated that this expanded program will be in place by 1/1/84.

Regarding the overtime guidelines of NUREG-0737, Boston Edison has committed to implementing these guidelines by means of Station Management Policy. We will formally commit to this policy if our review of the regulations indicates that such is required.

We take exception to one example of a violation that as of this writing remains unresolved. In a meeting immediately following the SALP, BECo defended the position we took in response to the original inspection violation in that the level of detail of the ATWS system description in our FSAR update is adequate in terms of the ATWS relationship to safety in a design basis event. The discussion finally centered on the primary issue; what constitutes an adequate FSAR update? It was decided that the Region would defer this question to NRR for interpretation. We believe it inappropriate to list this as a negative finding when it is still under review.

The on shift administrative support personnel is a new concept, and to have the staffing of that group listed in the report in a negative content is premature. We are most optimistic regarding the contribution this new group will make to the safe operation of Pilgrim Station and do not want to begin on a negative tone.

Senior management has been involved in both the post trip review process and the timeliness of responses to QA audit deficiencies. This attention will be escalated due to the findings in this report.

#### RADIOLOGICAL CONTROLS

As acknowledged by your staff in the meeting, Boston Edison has since responded to the issues raised by the NRC in Inspection Report 82-27. (BECo Ltr. #83-228, dated August 26, 1983).

Regarding the comments on the ALARA Program, the following status/comments are offered:

Procedures designed to implement the ALARA Program consistent with the direction of Nuclear Operations Procedure 83 RC1 will be implemented by November 1, 1983.

In addition, a special ALARA Outage Program is being developed and will be implemented for the duration of the 1983 refueling outage. This program includes dedicated ALARA personnel, written ALARA group instructions, pre-outage ALARA planning and task review, mandatory review and approval of all outage tasks by



ALARA personnel, ALARA training, ALARA job surveillance and post-task ALARA assessments. This program will ensure minimum individual and collective radiation exposures during the 1983 refueling outage.

We concur with the comments regarding the September 10, 1982 event but believe this finding could have stated that the actions taken by the licensee, although late due to appropriate management not being informed, were aggressive and appropriate.

We believe we do have a viable ALARA program and do not rely on our operational health physics program but rather, all first line supervisors who will have received special ALARA training. This training commenced September 12th. In addition, the CRE has, through NOP83RC1, had his responsibilities clearly delineated and his authority specifically identified.

The success of the program is measured by the reduction of personnel exposure during the reporting period.

At our meeting on September 21, 1983 you informed us that the team health physics evaluation listed in the recommendation section of our program was conducted by Mr. John White. We will be responsive to the results of that evaluation.

#### MAINTENANCE

Boston Edison recognizes the positive comments offered by the NRC regarding maintenance management personnel. Continued efforts will be made in the areas noted such that this area may be ranked as a Category One for the next assessment period. However, with only one violation and one deviation during the period we are disappointed that this section did not receive a Category 1 evaluation to recognize the major improvements made.

The procurement process, including purchasing and materials management is presently being redesigned to provide an on-line computer system which will minimize the time required for station personnel to requisition material and provide up-to-date on-line catalogs for stock items and spare parts.

In addition, the preservation of spare and renewal parts shall be computerized to ensure that maintenance is performed and items with shelf-life requirements are re-ordered in sufficient time to support station activities. A system of this type takes time to complete, therefore, an interim system is planned which consists of the following elements:

1. New requisition forms for Nuclear procurement are planned which will utilize a series of standard paragraphs for technical, quality and commercial requirements in order to provide consistency and minimize man-hours on repetitive requirements.
2. The receiving function shall change such that the inspection phase shall be used to interface with a computerized system for maintenance of materials in storage similar to the system installed at our warehouse for Unit 2. This is a system used in new construction type work that is being adapted for operating phase work.

3. The items presently in our warehouse shall be reviewed for "Q" or non-"Q" classification and the storage level, maintenance requirement, and shelf-life shall be identified for each item.
4. To provide control of items removed from the warehouse during the time it takes to implement these activities a visual examination of each item that is identified as "Q" shall be made.

We have designated an experienced, senior person to oversee the improvement planned in warehousing and procurement. We are considering at this time, increased staffing for the warehouse activities and evaluating the merits of establishing a materials management group. Our efforts will continue until the findings which prevented maintenance from receiving a Category 1 are resolved satisfactorily.

#### HOUSEKEEPING/FIRE PROTECTION

Boston Edison recognizes the positive comments offered by the NRC regarding the improvements in performance in this area as they are the result of a total team effort. Continued improvements are expected in several related areas including those of fire drill performance and training records. Further, attention will be given to addressing the concerns of brigade leader qualifications and training to prevent the assignment of conflicting duties and responsibilities to a single individual. We are particularly proud of the progress made in this Category and will continue our efforts to maintain the high standard of performance.

#### SECURITY

Please be advised that the recent (6/1/83) reorganization should provide for an increase in the level of management oversight in this area, particularly in the visibility, timeliness and effectiveness of corrective actions for identified problems. Part of this oversight will include an attempt to utilize the security organization more in a preventive mode than a reactive mode.

Senior management will become more actively involved in this functional area in our pursuit of excellence and our goal of category rating improvement.

#### SURVEILLANCE

We acknowledge this activity was rated Category 1 and concur that the NRC evaluation is accurate. No further discussion is warranted and we intend to continue this high standard of performance.

#### EMERGENCY PREPAREDNESS

We accept the findings of our emergency preparedness activities to be accurate and reflect the major attention the licensee has paid to this important activity. We will continue to provide the resources necessary to maintain the high standard of performance.

## LICENSING ACTIVITIES

We are particularly displeased with the overall assessment of the Licensing activities for this period and we request reconsideration of some of the examples which were used in the report to categorize performance as Level 2.

Part of the criticism levied in this area in last year's 1982 SALP report was that submittals were vague and general, needing considerable NRC effort and/or repeated licensee submittals to obtain acceptable resolutions with extensions of time frequently required. We have worked diligently to correct the noted deficiency. However, in the 1983 SALP, we are commended for providing responses to technical issues which are thorough, complete, and technically accurate while at the same time criticized for requiring extended periods of time to complete responses to several issues. We have demanded quality responses which were more meaningful and required more time to prepare.

The RETS for example was an issue at hand back in 1978. The NRC reviewed this issue for several years before re-establishing serious contact for closeout (August, 1982). Our final submittals comprised 80 pages of Technical Specification changes plus a 90 page Offsite Dose Calculation Manual, indicative of the level of detail and time frame we believed necessary to devote to such a product.

As you are aware, Masonry Wall design and Control of Heavy Loads originated at the NRC in 1980. Although these issues carried into this assessment period, the fact that the remaining problems were identified, scoped, planned, and closed out in this assessment period should be reviewed in a favorable light.

The statements made in the report alluding to a lack of understanding of certain aspects of a complex technical issue (i.e. Fire Protection) are worthy of further discussion. For the record, Boston Edison was a member of the Nuclear Utility Fire Group, a group which was formed by various Utilities through the law offices of Debevoise and Liberman, to interface with the NRC staff and obtain clarifications, interpretations, and acceptable means of complying with the Fire Protection regulations. In maintaining compliance with these regulations, Boston Edison submitted exemption requests and methods of compliance within the time frames required. The sequence of subsequent events was unfortunate in that the NRC review staff looked unfavorably on the format of our submittal and this was coupled with a six month delay in NRC review. Although Boston Edison requested clarification meetings and was denied, other utilities receiving more prompt reviews had met with the NRC staff. From those meetings they were able to both clarify and re-submit their applications. These actions placed Boston Edison in an uncertain situation in terms of meeting the compliance dates. For the record, Boston Edison did meet with the NRC eventually where the needed information exchange took place resulting in a resubmittal under the provisions of another regulation. This resubmittal was well received by the NRC staff.

We will endeavor to improve the processing of incoming Technical Specification changes. However, the example used in the report to point out an inadvertent omission of the Technical Specification requirement for core power-to-flow was not, in our opinion, appropriate to support the finding. In that particular technical specification change, an error was made by the NRC staff in May, 1980. Boston Edison in turn did not notice this mistake when the change was processed

inhouse. The fact that this omission was discovered by Boston Edison within this assessment period demonstrates a current cognizance for attention to detail. We therefore strongly reemphasize our request that the Licensing activities evaluated be limited to the current assessment period only. Otherwise, attaining a Level 1 category will be most difficult and discouraging to the Boston Edison personnel involved with licensing activities.

For your information, a procedure has been developed (NOP) which, when implemented, will require an action plan to be developed consisting of milestone dates. These milestone dates will be identified as an exception if missed, and subsequently brought to the attention of upper management for resolution. We believe these are appropriate and responsive actions.

We do not wish to appear contentious in discussing the rating we received for this category. We hope our diligent efforts expended to discuss our request for reconsideration will be accepted in the spirit in which they are submitted. We are keenly aware of the significance of the SALP findings and category ratings and trust our responses demonstrate the importance we attach to the report.