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WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

February 22, 1983  
BECO Letter No. 83-51

Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pa. 19406

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

Subject: Combined Inspections 82-02/82-03

- References: (A) NRC letter of April 29, 1982 from Mr. T.T. Martin to Mr. W.D. Harrington (BECO letter 1.82.126)
- (B) Boston Edison letter of May 19, 1982 from Mr. W.D. Harrington to Mr. T.T. Martin (BECO letter 2.82.151)
- (C) NRC letter of January 27, 1983 from Mr. T.T. Martin to Mr. W.D. Harrington (BECO letter 1.82.013)

Dear Sir:

This responds to Reference (C), which transmitted your reasons for not concurring with portions of Reference (B) submitted in support of our request for the withdrawal of Appendix A, Item B Notice of Violation (Reference (A)).

I. NRC Statement

The first example states that Maintenance Request (MR) 81-12-52, Replacement of Reactor Water Cleanup System Piping was, in part, performed without an approved procedure, and your response states that the only element of this task not covered by an approved procedure was placement of the piping in accordance with an isometric, which you indicated was within the skills normally possessed by a mechanic and therefore permitted by ANSI N18.7-1972.

We do not concur for the following reasons:

- a. Office memorandum M-81-350 describes the replacement of a section of Reactor Water Cleanup System piping; starts with the phrase "This replacement procedure....;" and, continues by specifying the sequencing of work, the actual work to be performed, when and how QC was to be involved, and the piping fit up, welding and post-work test procedures to be utilized. While the individually referenced generic procedures had been approved, their selection for this job had not been. While individual tasks specified in M-81-350 may have been within the skills

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of the mechanics, the sequencing of work, QC involvement, material specifications and other information contained in M-81-350 were important to the correct performance of this job.

- b. As noted in the details of the inspection report, there is an existing Pilgrim Station procedure 3.M.1-11, "Routine Maintenance" which specifies the type of work which may be done without a procedure. Replacement of major pieces of reactor plant piping which we view this situation to be, is not included in this procedure.
- c. Technical Specification 6.8.1 and 6.8.2 requires that procedures under the scope of ANSI N18.7-1972, paragraph 5.1 be reviewed by the ORC and approved by the ORC Chairman. Maintenance procedures fall within the scope of ANSI N18.7-1972, paragraph 5.1. Office memorandum M-81-350 was issued and used as a maintenance procedure, but was not reviewed by the ORC and approved by the ORC Chairman.

Based on the above, our finding still remains that this example falls within the scope of the requirements of ANSI N18.7-1972 and Technical Specification 6.8, and constitutes a violation.

BECO Response

We respectfully request that you reconsider your position and sustain our request on the above issues based on the following clarification:

*Technical Error*  
The memo you referenced (M-81-370 vice M-81-350 in Reference (C)) was written to satisfy the requirement of ASME Section XI, which requires that a Repair Plan exist for Code repairs/replacements, and so states in both the title and the first paragraph. It was not intended or used as a "Procedure," but was, through an error of word choice, labelled such.

*was used by CRH*  
We also wish to point out that the addressee of memo M-81-370 is a member of the Pilgrim Station Quality Control group, not a member of maintenance. He was provided with this memo to satisfy IWA-7000. The memo is merely the documentation of references used, the logical order of necessary steps, and a record of the appropriate procedures used.

*Right*  
We concur that this work could not be classified as routine maintenance, and therefore procedure 3.M.1-11, "Routine Maintenance," is inappropriate. However, we maintain that the work was coordinated by the use of Procedure 1.5.3, "Maintenance Requests." The purpose of this procedure is to ensure that the requirements of ANSI N-18.7 are met, that is, that all aspects of maintenance are addressed. This includes the sequencing of work, the involvement of Quality Control, material specifications, and retest requirements.

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Additionally, we believe that the selection of approved procedures by the Senior Maintenance Engineer for maintenance tasks, with review by the Chief Maintenance Engineer, is allowed by Procedure 1.5.3, and is a crucial part of it.

*Agree*

To re-review existing procedures written to facilitate maintenance tasks each time such procedures are needed would place an unnecessary burden on the ORC, which would reduce their effectiveness.

## II. NRC Statement

Concerning the second example which stated that MR 81-23-35 authorized the repair, adjustment and test of the HPCI Turbine Stop Valve Balance Chamber by use of an unapproved procedure, your response stated that a violation had not yet occurred and was prevented as a result of the inspection.

We do not concur for the following reasons:

- a. MR 81-23-35 authorized the use of G.E. SIL 352. This maintenance had been authorized on October 13, 1981 and was still in progress at the time of the inspection on January 1982. SIL 352 prescribes procedures for the repair, adjustment, and test of the HPCI Turbine Stop Valve Balance Chamber. Based on discussions with your staff, adjustments of the HPCI Turbine Stop Valve Chamber per the SIL had been performed and the MR remained open pending completion of testing.
- b. Technical Specification 6.8.1 and 6.8.2 and ANSI N18.7-1972 require that maintenance and test procedures be reviewed by the ORC and approved by the ORC Chairman - SIL 352 had no such review and approval.
- c. Although the actual testing had not yet started at the time of our inspection, we determined, and your staff confirmed, that approval per the Technical Specifications of SIL 352 or issuance of a separate approved procedure had not been planned.

Based on the above, which notes that SIL 352 was authorized (See 2.a above) and partially performed, although, the test portion had not yet been performed, our finding still remains that this example is within the scope of Technical Specification 6.8 and constitutes a violation.

## BECO Response

We tacitly agreed in Reference (B) that MR 81-23-35 authorized the use of G.E. SIL 352 prior to ORC approval, and that, had not the inspection identified it, we would have inadvertently committed a violation. Our basis for requesting the withdrawal of this violation was the belief that because the final step of the violation was prevented from happening, no violation occurred.

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Reanalysis of the issue leads us to concur that a violation did, in fact, take place, because SIL 352 pertained to a safety system and therefore was subject to ORC review before MR 81-23-35 was approved.

We believe this to be an isolated event caused by a failure to recognize the necessity of an ORC review for this particular SIL. However, to preclude recurrence of the evolution which led to this error, the Chief Maintenance Engineer and the Staff Engineer (Maintenance) were given counselling by the ORC Chairman to clarify the criteria involved and their responsibilities concerning ORC review.

Full compliance has been achieved.

### III. NRC Statement

Concerning the third example which stated that MR 80-1589 authorized maintenance and test of the HPCI stop valve hydraulic cylinder, without an approved procedure, your response states that this maintenance was performed with an existing PNPS procedure. We note that MR 80-1589 does not reference a PNPS procedure nor was a procedure provided to us during the inspection. Based on your response, this example is considered unresolved (50-293/82-02-07) and will be reviewed during a future NRC: Region I Inspection.

#### BECO Response

The maintenance work preceding the test was performed under Procedure 3.M.1-11 "Routine Maintenance" and Procedure 1.5.3, "Maintenance Requests."

However, after reexamining the event we concur that a violation took place because the test was conducted in accordance with SIL-306 prior to its review by the ORC.

We believe the cause was the same as for II above, and that the corrective action of counselling the Chief Maintenance Engineer and the Staff Engineer (Maintenance) will preclude recurrence.

Full compliance has been achieved.

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

*Marian M. DeCamp*  
Notary Public