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SENIOR VICE PRESIDENT
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July 2, 1984
BECO Ltr. #84-096

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

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

Subject: Response to Notice of Violation 84-11-01
(NRC Inspection No. 50-293/84-11)

References: NRC Letter to Boston Edison, dated June 8, 1984

Dear Mr. Martin:

This letter is in response to the violation identified during an inspection conducted by Dr. P. K. Eapen and Mr. J. A. Prell of your office on April 23-27, 1984 and communicated to Boston Edison Company in Appendix A of the reference.

Notice of Violation (84-11-01)

Pilgrim Nuclear Power Station Technical Specification 6.8.A states in part: "Written procedures and administrative policies shall be established, implemented, and maintained that meet or exceed the requirement and recommendations of ...Appendix 'A' of USNRC Regulatory Guide 1.33." This appendix includes procedures for modification.

Station Procedure 1.5.5, "Cutting, Welding, and Hot Work," requires: "Measures shall be established to contain falling slag," during welding.

Contrary to the above, on April 26, 1984, the welding activities for the rigging lugs located at elevation 41' and azimuth 180⁰, were conducted without establishing measures to contain falling slag.

Corrective Steps Taken to Correct the Violation and Results Achieved

Upon investigation of the incident, it was concluded that precautionary steps had been taken prior to the subject welding activities in that fire-retardant blankets were installed in the area.

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However, the amount of blankets installed might not have been sufficient to properly contain falling slag and sparks, as observed by the NRC and QC inspectors. The activity was stopped until further preventive measures were taken.

On June 19, 1984, the GE Project Manager instructed all Area Managers to (1) use the subject violation as an object lesson in future staff and shift turnover meetings, (2) add fire safety to the list of items being checked on routine patrols of the drywell. Those Area Managers confirmed that they had implemented the above corrective actions by 6/22/84.

Corrective Steps Taken to Preclude Recurrence

On June 27, 1984, a memo was issued by the Director of Outage Management to the Craft Site Supervisor re-emphasizing the need to properly and safely perform welding and cutting activities and that he take actions to increase the awareness of field supervisory personnel of the requirements of Procedure 1.5.5 ("Cutting, Welding, and Hot Work Permits") as they apply to sound fire prevention practice during Hot Work operations.

Date When Full Compliance Was Achieved

Full compliance was achieved by 6/22/84, the date upon which the need for increased fire safety awareness was fully communicated to craft and craft supervisory personnel.

We would like to emphasize that Boston Edison management is confident with the aggressive Fire Protection Program we have undertaken at Pilgrim Station, particularly during cutting and welding activities conducted this outage in support of the Recirculation Pipe Replacement and other projects. These activities have been done with personal safety and protection of safety-related equipment uppermost in our minds. We would also like to emphasize that the subject violation represents an isolated situation, rather than a generic problem. Good fire protection practice needs periodic re-emphasis and aggressive management attention. In addition to our Fire Protection Program, the above-stated actions will provide further assurance that workers continue to be aware of this need to protect safety-related equipment and personnel from the hazards involved with cutting and welding activities.

If you have any questions or require further information on this subject, please do not hesitate to contact me.

Respectfully submitted,

W D Harrington
W. D. Harrington

JC:caw