

BOSTON EDISON COMPANY
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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

May 16, 1984
BECO Ltr. #84-071

Mr. Thomas T. Martin
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: Inspection 84-06

References: (a) NRC Letter to Boston Edison, dated April 27, 1984

Dear Sir:

This letter responds to a violation identified during a routine safety inspection conducted between February 13 and February 17, 1984 and communicated to Boston Edison Company in Appendix A of the above-referenced letter.

Notice of Violation "A" (VIO 84-06-02)

Technical Specification 6.8, "Procedures," states in part: "Written procedures...shall be established, implemented, and maintained that meet or exceed the requirements...of Appendix 'A' of USNRC Regulatory Guide 1.33," which identified typical safety-related activities to be covered by written procedures; specifically, access control to radiation areas including a Radiation Work Permit System..

Pilgrim Nuclear Power Station Procedure No. 6.1-022, Revision 12, dated November 23, 1983, "Radiation Work Permits" states, "All persons who are to enter the work area shall be briefed by an HP representative on the physical and radiological conditions in the work area. Once briefed, each individual shall sign in on the RWP sign-in sheet...The HP Technician will...sign the RWP sign-in sheet to document the briefing and authorization."

Contrary to the above, on February 15, 1984, two individuals entered into a radiation area (Condenser Bay A) to perform work without the required authorization and briefing by an HP representative on the physical and radiological conditions in the work area. The individuals did not sign in on the appropriate RWP which controls access to this radiation area.

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Response

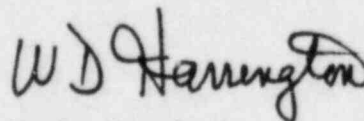
Based on our investigation of the incident, it was concluded that two individuals had entered Condenser Bay "A" to perform work without the required authorization and briefing by an HP representative solely on the direction of their supervisor.

The corrective step taken was that the supervisor in question was reprimanded for his actions on 2/15/84 (the date of the incident), and the result achieved is that he admitted his error in judgement in instructing the workers to enter the area. We are confident that he will correctly adhere to Station policies and procedures in any future situations of a similar nature. The corrective step taken to avoid further violations was that on February 17, 1984 a meeting was held with Bechtel field supervision. The subject occurrence was described to all present and instructions given as to how to avoid similar situations from occurring in the future.

Full compliance was achieved on February 17, 1984, the date when the above-mentioned instruction was completed.

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

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "W D Harrington". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

W. D. Harrington

JC:caw