

BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

May 14, 1984

BECO. #84-070

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: Combined Inspections 82-02/82-03

- Reference: (a) NRC letter of April 29, 1982 from T. T. Martin
to W. D. Harrington (BECO. ltr. 1.82.126)
- (b) Boston Edison letter of May 19, 1982 from
W. D. Harrington to T. T. Martin (BECO. ltr. 2.82.151)
- (c) NRC letter of January 27, 1983 from T. T. Martin
to W. D. Harrington (BECO. ltr. 1.82.013)
- (d) Boston Edison letter of February 22, 1983 from
W. D. Harrington to T. T. Martin (BECO. ltr. 2.83.051)
- (e) NRC letter of April 10, 1984 from T. T. Martin
to W. D. Harrington (BECO. ltr. 1.84.092)

Dear Sir:

In response to Reference (e) dated April 10, 1984 and received by Boston Edison Company on April 14, 1984, the following is offered for your consideration in resolving the open Violation B of the subject combined inspections.

In your request to specifically define our mechanisms for determining when safety-related maintenance requires an approved procedure and when such procedure must be reviewed by the Operations Review Committee (ORC), please note that Procedure 1.5.3 (Maintenance Requests) contains a prerequisite that all Station maintenance (with certain exceptions) shall be performed in accordance with

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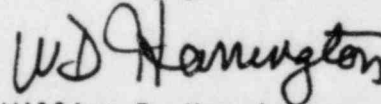
Mr. Thomas T. Martin
May 14, 1984
Page Two

approved procedures for unplanned maintenance. Procedure 1.5.7 is more explicit in that if an approved procedure does not exist for work activities determined to be Q, the Chief Maintenance Engineer, or his designated alternate, shall prepare a procedure and have it approved by the ORC prior to approving the Maintenance Request (MR).

To ensure that these requirements are understood, we will provide clarification to appropriate Station Maintenance personnel to ensure that plans for safety-related work performed under an MR which involves approved procedures shall be included (documented) on the Maintenance Summary and Control Sheet (MSC) or future equivalent. This will be completed by June 1, 1984.

If you have further questions on this matter please contact me.

Very truly yours,

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

William D. Harrington

WDH/mg