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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

July 27, 1984
BECO Ltr. #84-114

Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

NUREG 0737, Item I.C.6

Dear Sir:

By letter of June 14, 1984, NRC identified differences between the NRC position on I.C.6 and the Pilgrim Station procedures referenced in past correspondence. Boston Edison in this submittal wishes to clarify past positions, and to address the specific questions contained in the June 14, 1984 letter.

I. Authorization for Tagging

In general, various members of the PNPS staff are considered qualified to "tag" systems in accordance with the various operational and maintenance procedures. However, all such tagging activities are assigned by and under the cognizance of licensed personnel such as the Control Room Supervisor and the Watch Engineer.

The specific requirements of those involved in hanging tags is governed by the Pilgrim Nuclear Power Station Training Manual and practices of the various groups. For example, Form O-1, "PNPS Operations Training Group General Indoctrination," is required to be completed and the individual must be qualified to stand watch alone prior to being assigned to tagging. Similarly, the other Station groups require use of such forms and individuals must be qualified to perform the activity for which they are tagging. Such is the case for the Instrument and Control technicians who perform a constrained form of tagging when they isolate or "jumper" individual instruments to perform surveillance and calibrations. Boston Edison considers these individuals are qualified by virtue of their education, training, and experience. They "isolate" instruments in accordance with predetermined procedures which have been approved by the PNPS Operations Review Committee (ORC). A return to service is verified by post-maintenance testing or component operability testing.

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II. Independent Verification

Independent verification as described in I.C.6 is to ensure that safety systems will be available if called upon during an event.

Boston Edison believes that this assurance is best provided by system testing. Pre-maintenance operability of redundant systems is assured by testing in conformance to applicable technical specifications when a safety system is removed from service.

Conversely, post-maintenance testing demonstrates that a system being returned to service meets its designed objective. Such testing is designated by technical specifications or is generated out of reviews conducted in conformance with the Maintenance Request Procedure, 1.5.3. This requires a number of reviews which are designed to allow independent review by the Watch Engineer, the Operating Supervisor and the Maintenance Staff (i.e., supervisor or technician or worker).

In addition, Procedure 1.5.3 requires that the supervisor make an inspection of the work area including isolations/tagging in effect prior to the work commencing.

Boston Edison therefore believes that work performed under the aegis of Procedure 1.5.3 satisfies I.C.6 "double verification" because of the review process and the post-maintenance operability testing.

Watch Engineer tagging is performed in accordance with PNPS procedure 1.4.5. Such tagging is used when an obvious danger or potential malfunction manifests itself without allowing time for a formal maintenance request to be issued. By their nature such incidents often evolve into maintenance requests and would undergo the reviews associated with that process.

III. Post-maintenance Configuration Verification

As stated earlier, Boston Edison verifies system configuration with post-maintenance operability testing. Such testing for safety systems employs the surveillance procedures for the system being returned to service. Therefore the system is configured for its surveillance test and successful completion indicates that the equipment is operable.

As part of the ongoing Procedure Update Program (PUP), and as identified in IE Inspection 84-12 (page 20), I.C.6 guidance for double verification to ensure a return to normal lineup is being incorporated into appropriate station procedures. Boston Edison believes that

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incorporation into safety system surveillance procedures gives assurance that equipment is both operable and properly configured after maintenance..

In addition, Procedure 1.3.34, "Conduct of Operations," will be amended to contain information about the requirement for double verification in accordance with I.C.6. Similar information will be added to Procedure 1.4.5, "PNPS Tagging Procedure."

IV. ALARA Concerns

NOP 8301 contains a note stating that double verification need not be physically performed in fields >25 mr/hr. This was not made a requirement to allow flexibility to the on-shift personnel. Boston Edison is committed to keeping personnel radiation exposure at the lowest achievable levels consistent with the safe operation of the plant. It is recognized, however, that special conditions may arise where I.C.6 concerns might warrant exposure at a greater level than 25 mr/hr. Such determination must be made on a case-by-case basis by those most conversant with the situation - the on-shift personnel - consistent with procedures, guidelines, and the Code of Federal Regulations. We therefore feel that the ALARA concerns of I.C.6 are adequately addressed by the existing guidance in conjunction with Pilgrim's health physics practices and procedures.

We believe this response clarifies our position on I.C.6 and addresses your request of June 14, 1984. Should you wish further information, please contact us.

Very truly yours,

WJ Harrington

Attachments:

PNPS Form 0-1: General Indoctrination
Procedure 1.4.5 "PNPS Tagging Procedure"
Procedure 1.5.3 "Maintenance Request Procedure"
Procedure 1.3.34 "Conduct of Operations"

PNPS
OPERATIONS TRAINING GROUP
GENERAL INDOCTRINATION

Name _____ Social Security # _____

Complete an indoctrination on the procedures and instructions which are applicable to the Operations Group that implement the Quality Assurance Program. This indoctrination will include the following:

- | | | |
|-----|----------|---|
| 1. | 1.1.1 | Station Organization Responsibilities |
| 2. | 1.2.1 | Operations Review Committee |
| 3. | 1.3.2 | Special Orders |
| 4. | 1.3.4 | Procedures |
| 5. | 1.3.6 | Adherence to Technical Specifications |
| 6. | 1.3.7 | Records |
| 7. | 1.3.8 | Document Control |
| 8. | 1.3.9* | Reports |
| 9. | 1.3.13 | Plant Design Changes |
| 10. | 1.3.23* | Preparation of Safety Evaluation |
| 11. | 1.3.24 | Failure and Malfunction Reports |
| 12. | 1.3.26* | Response to Deficiency Reports |
| 13. | 1.3.34 | Conduct of Operations |
| 14. | 1.4.5 | PNPS Tagging Procedure |
| 15. | 1.4.6 | Housekeeping |
| 16. | 1.5.3 | Maintenance Request |
| 17. | 1.5.7 | Unplanned Emergency Maintenance |
| 18. | 1.5.9 | Jumper System (Temporary Modifications) |
| 19. | 3.M.1-1* | Preventive Maintenance |
| 20. | 3.M.1-5 | Procurement of Items and Services |
| 21. | 3.M.1-8* | Disposition of Non-Conforming Material |
| 22. | 8.1 | Periodic Surveillance Tests |

Requirements Satisfied: a) 10CFR50, Appendix B
b) ANSI N18.7
c) BEQAM, Volume II

Date Completed

Signature, Day Watch Engineer

Date

Signature, Nuclear Training Specialist

Date

Senior Nuclear Training Specialist

Return the completed form to the Training Department.

*Management Only