

BOSTON EDISON COMPANY  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

October 24, 1984  
BECO. 84-180

Dr. Thomas E. Murley  
Regional Administrator  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

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

- References: (1) Boston Edison Company's Performance Improvement Plan (PIP), Rev.2 (BECO. Letter 83-60, dated February 28, 1983)
- (2) Attachment (B) to Boston Edison Letter 83-60, dated February 28, 1983

Dear Dr. Murley:

The purpose of this letter is to clarify Boston Edison Company's (BECO) intended commitment (Milestone Product) which will be presented for NRC review and acceptance in accordance with the October 31, 1984 Performance Improvement Plan (PIP) Milestone, Section III.3.D (PIP 3), and to formally request your approval to modify a small scope of the total commitment to be consistent with plant system startup requirements, if it becomes necessary. Providing advance clarification is appropriate for this Milestone, given the magnitude of the coordination effort that was required, the evolving nature of some of the issues (Vendor Manual Update), and the unanticipated, coincident occurrence of PIP closeout activities with RFO #6 operational turnover activities. It is believed this additional information will be mutually beneficial.

Drawing and Procedure Update Approach

The October 1984 PIP Milestone (References 1 and 2) specifies a BECO commitment to provide updated drawings and procedures by performing closeout activities for the backlog of Plant Design Change Requests (PDCR's) which occurred prior to October 1982. Information derived from the PDCR closeout activities was incorporated into selected drawings and procedures, based upon the day-to-day operating and maintenance needs of plant systems. The cut-off point for inclusion of the backlog PDCR information was specified as October 1982 (Reference 2), this date being consistent with the establishment of Pilgrim's Modification Management Group. This group routinely performs a formal procedural process aimed solely at capturing and dispositioning configuration control information related to plant modifications.

8503280193 850311  
PDR ADOCK 05000293  
P PDR

84-92

Dr. Thomas E. Murley

October 24, 1984

Page 2

The drawings and procedures associated with our PIP commitment have been updated to include the most current information available. A description of the scope of drawings and procedures updated (including Vendor Manual references) follows.

### Drawings

The drawing update effort was based upon the review of over 1,200 backlog PDCR's and resulted in closeout activities on 675 PDCR's in accordance with a prioritized systems approach. A total of 433 drawings have been updated (referred to as Priority "A's"), with an even larger scope of Priority "B" drawing updates still ongoing (85% complete). These Priority "B" drawings are not a PIP commitment, but were included to improve the accuracy of additional "affected" drawings, which will complement the engineering activities of the Organization.

The July 1984 PIP Milestone reported the drawing update effort as complete, with the clarification that certain design changes were shown on drawings issued for the Nuclear Operations Department's (NOD) use in the Procedure Update Program (PUP) only. These drawings will be reissued for general use as individual work items required to verify proper implementation are completed. All such drawings, except for five (5) P&ID's affected by Radwaste changes, will be updated and signed out of the Nuclear Engineering Department (NED) on or before October 31, 1984. Formal issuance of approximately 40 of these drawings also require incorporation of RFO #6 design changes and may be delayed beyond October 31, 1984 if the present outage schedule is extended. The identified Priority "A" drawings which incorporate completed design changes will be issued prior to unit restart. The five (5) P&ID's affected by Radwaste changes require further disposition. Due to the minor significance of these items, the radiation exposure which would be incurred to resolve them may not be warranted. They pose no safety concerns and therefore will be addressed to appropriate Department Managers for resolution.

Additionally, conflicting or additional drawing changes which have been identified by operations and maintenance personnel during their procedure update review and system walkdown activities (utilizing the updated drawings) will be captured for evaluation, but not necessarily reflected in subsequent drawing changes prior to October 31, 1984. The instructions for processing conflicting information (deviations) such as these are communicated to personnel in the Procedure Update Program (PUP) Work Instructions.

### Procedures

The PUP Milestone, when completed, will establish compliance with the October 1984 commitment. The PUP effort has been conducted concurrent with the drawing update task and is also based upon a prioritized systems approach to updating plant operating and maintenance procedures.

Dr. Thomas E. Murley

October 24, 1984

Page 3

A total of 660 plant procedures are being reviewed under this Program. Each procedure is reviewed against eight (8) potential update issues: Design, Policy, INPD, User Experience, Modification Management Feedback, Training Department Feedback, Vendor Manual References, and Procedure Classification (Safety vs. Non-Safety-Related). At present, 60% of these procedures have been approved by the Operations Review Committee (ORC), and 90% have had the Program reviews performed.

The balance of PUP work to complete, which is required to meet our PIP October Milestone, is in jeopardy because of the massive peak document processing work load created by the simultaneous PUP and RFO #6 document update needs.

It is therefore planned to allow the PUP procedures affected by RFO #6 modification activities to be updated according to plant start-up needs, rather than the October 31, 1984 PUP Milestone date.

#### Vendor Manuals

The Vendor Manual (VM) Control task is a dependent task of the PUP in that the total number of Vendor Manuals identified as technical references is dependent upon the updated "References" section of the PUP procedures. As reported to you in the September 18, 1984, BECo-NRC PIP Status Update Meeting at your offices, the number of Vendor Manual references identified thus far is 313 and is expected to decrease as the BECo Vendor Manual control processing continues.

The Vendor Manual Control process utilized by BECo was first defined in a Nuclear Organization Procedure (NOP) in February 1983. The procedure has since been tested by processing one (1) Vendor Manual through the Organization. As with any new process, initial problems and deficiencies were identified which required resolution.

Currently, our Vendor Manual Control process has evolved to address both a control and a validation aspect for VM information. BECo's intent is to first establish control of the VM information referenced by PUP procedures, followed by an ongoing validation effort. This effort subsequently recycles the controlled VM information through a more detailed review, focusing on specific applicability to Pilgrim Station's equipment. Pilgrim's VM's will also be classified depending upon their applicability to safety-related activities.

The establishment of VM information control for the scope of VM's identified in the PUP is well underway. An inventory search has been performed, the potentially missing manuals have been identified, and action has been taken to either obtain or evaluate the need to procedurally reference these VM's. The control-processing of PUP-VM's in our possession is in progress, and approximately 230 will be consolidated and compiled for entry into the VM Control process on or before October 31, 1984.

Dr. Thomas E. Murley  
October 24, 1984  
Page 4

As mentioned, BECo has controlled and validated one (1) plant-specific Vendor Manual thus far (Lubrication Manual) and will accomplish validation of at least four (4) additional Manuals on or before October 31, 1984.

Additional action with respect to Vendor Manual Control will be committed to INPO in response to INPO's 1984 Evaluation of Pilgrim Nuclear Power Station (Finding OA.6-1). This Finding involves recommendations related to VM technical reviews and incorporation of update information.

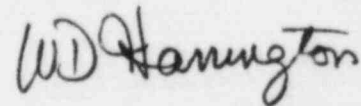
In summary, we believe the schedule, actions taken, and action planned, as described above, are consistent with the intended scope of Boston Edison's PIP Milestone, Commitment III.3.D (PIP 3).

The PUP extension consideration for those procedures which also require update due to RFO #6 modification activities was discussed with your Mr. Glenn Meyer in a telephone conversation with our PIP Manager on October 10, 1984. It was agreed that this request was reasonable and consistent with the intent of the commitment.

We respectfully request your approval of the PUP schedule extension in accordance with Section V of the Order.

Please contact this office if you have any questions or concerns regarding this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read "W.D. Hanington". The signature is written in a cursive, slightly stylized font.

WHD/kmc