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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

June 28, 1985
BECO 85-119

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 DPR-35
Docket 50-293

Subject: NRC Request for Additional Information Following Preliminary
Staff Review of Licensee Response to Generic Letter 83-28, dated
April 23, 1985

- References: (1) Boston Edison Company Response to Generic Letter 83-28,
BECO Ltr. #83-275, dated November 7, 1983
- (2) Boston Edison Company Response to Generic Letter 83-28,
Section 2.2.2, Vendor Interface, BECO Letter #84-061,
dated April 27, 1984

Dear Sir:

Boston Edison Company (BECO) received the subject letter on May 2, 1985, requesting additional information on Generic Letter 83-28 within 60 days from the receipt of NRC letter. BECO previously submitted responses to GL 83-28 by Reference (1) and (2). The attachment provides our response to the subject NRC request on GL 83-28. As stated in the attachment, response to Item 4.5.3 will be provided by August 1, 1985, following BECO evaluation of BWROG Response on Item 4.5.3. Should you desire any further information on our response, please contact us.

Very truly yours,

WD Harrington

Attachment

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ATTACHMENT

BECO RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION
TO GENERIC LETTER 83-28

A. NRC REQUEST

Item 2.1 (Part 2) - Incomplete

Licensee needs to submit a statement that components used for reactor trip have been reviewed and are identified as safety-related on documents and in information handling systems.

BECO RESPONSE

As stated in Reference (1) Item 2.2.1.1, components within systems classified as safety related are themselves considered safety-related and are included in our Q-list. This Q-list includes Safety-related components of RPS.

B. NRC REQUEST

Item 2.1 (Part 2) - Incomplete

Licensee needs to describe its program for establishing and maintaining an interface with vendors of components used for reactor trip. Information submitted shall describe how the program assures that vendor technical information is kept current, complete, and controlled throughout the life of the plant and how the program will be implemented at Pilgrim.

Item 2.2.2 - Incomplete

Same as for Item 2.1 (Part 2) except that it applies to all other safety-related components.

BECO RESPONSE

BECO receives and reviews correspondence from the NSSS Vendor in accordance with our current established practice on GE correspondence for applicability to safety-related equipment repairs, maintenance and operations. With regard to all other safety-related components, the Vendor Equipment Technical Information Program (VETIP) as defined in the March 1984 NUTAC document is considered a valid response to Section 2.2.2 of the Generic Letter 83-28. BECO is in the process of addressing those elements of VETIP which would supplement our ongoing Operations Experience Review and Vendor Manual Control Programs (See Ref. 2) for an effective and efficient Vendor Interface Program.

C. NRC REQUEST

Item 3.1.3 - Incomplete

Licensee needs to state if he has found any post-maintenance testing requirements for RTS components that may degrade safety. If any such requirements are identified, the licensee shall describe actions to be taken including submitting needed Technical Specification changes.

Item 3.2.3 - Incomplete

Same needs as for Item 3.1.3 except that it applies to all other safety-related components.

BECO RESPONSE

To date BECo has not found any post maintenance testing requirements that degrade safety. Recently, BECo has completed a HPCI reliability study. The results of this study are being evaluated to determine changes in Technical Specifications. BECo is also investigating the emergency diesel generator performance to optimize the performance. If these studies identify any post-maintenance testing that may degrade safety, BECo will propose to amend technical specifications.

D. NRC REQUEST

Item 4.5.3 - Incomplete

The staff finds that modifications are not required to permit on-line testing of the backup scram valves. However, the staff concludes that testing of the backup scram valves (including initiating circuitry) at a refueling outage frequency, in lieu of on-line testing, is appropriate and should be included in the Technical Specification surveillance requirements. The licensee needs to address this conclusion.

Regarding the scram pilot valves (including all initiating circuitry), the licensee needs to provide the results of a review of existing or proposed intervals for on-line testing considering the concerns of sub-items 4.5.3.1 to 4.5.3.5 of the generic letter. The response should show how these intervals result in high reactor trip system availability and present proposed Technical Specification changes for staff review.

The staff has just received the BWR Owners Group response to Item 4.5.3 (NEDC-30844). If the licensee intends to formally endorse the Owners Group response, the licensee should delay his plant-specific response to Item 4.5.3 until after the staff completes its review of the Owners Group response.

BECO RESPONSE

BECO is currently evaluating BWROG Response to Item 4.5.3 (NEDC-30844) and will advise you regarding its applicability to PNPS by August 1, 1985. Also, our response to the remaining items of 4.5.3 will be submitted at that time.