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SENIOR VICE PRESIDENT
NUCLEAR

May 24, 1985
BECO Ltr. #85-096

Mr. Edward C. Wenzinger, Chief
Projects Branch No. 3
U.S. Nuclear Regulatory Commission
Region I - 631 Park Avenue
King of Prussia, PA 19406

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

Subject: Response to Violations as Contained in
NRC Inspection Report No. 85-06

Reference: NRC Letter to Boston Edison, dated April 25, 1985

Dear Mr. Wenzinger:

This letter is in response to the violations identified during an inspection conducted by Messrs. J. Johnson and M. McBride of your office during the period March 5, 1985 to April 1, 1985 and communicated to Boston Edison Company in Appendix A of the reference.

Notice of Violation "A"

Technical Specification 1.0.V and Table 4.1.2 require that the local power range monitors (LPRM) be calibrated prior to being declared operable if a calibration during the previous surveillance interval has been waived.

Contrary to the above, between March 22 and 23, 1985, the 44-13A LPRM was declared operable without a prior calibration. The LPRM calibration during the previous surveillance interval had been waived.

Response

Upon further investigation of the incident, it was concluded that between March 22 and March 25, 1985, the switch for the 44-13A LPRM was inadvertently moved from the "Bypass" position to the "Operable" position. This was done during the weekly performance of the APRM functional test. We consider this to be an isolated case of an individual's failure to follow procedure.

The corrective step taken to correct the condition is that upon discovery of the incorrect switch position, the switch was placed back in the "Bypass" position.

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The corrective step taken to prevent further violations is that a memo was issued to Control Room personnel describing this incident and reminding them of the importance to adhere to procedures.

Full compliance was achieved on March 27, 1985, the date on which the LPRM switch was moved back to the "Bypass" position.

Notice of Violation "B"

Technical Specification 4.7.B.b.1 requires that in-place cold dioctyl phthalate (DOP) testing be performed on the high efficiency particulate air (HEPA) filter banks in the standby gas treatment system if structural maintenance is done on the HEPA filter system housings which could affect bypass leakage.

Contrary to the above, on March 15, 1985 no DOP testing was performed on the "A" train of the standby gas treatment system following the removal and re-installation of HEPA filter banks in that train (a structural maintenance activity that could affect bypass leakage).

Response

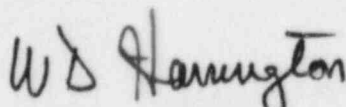
Boston Edison denies the contention that we were in violation of Technical Specification 4.7.B.b.1, which requires DOP testing be performed on the HEPA filters after (either) (1) replacement of the HEPA filter bank or (2) (subsequent to) any structural maintenance on the HEPA filter system housing which could affect the HEPA filter bank bypass leakage. The subject section of the Technical Specifications does not state any specific time constraints within which the DOP test should be performed. Nevertheless, we admit a procedural weakness in that the testing had not been done in a timely manner.

Upon the Inspector bringing the situation to our attention and as corrective action to correct the condition, a successful DOP test of "A" train was conducted on March 27, 1985.

Corrective action to preclude recurrence is that in order to assure more timely testing and improved controls for future situations in which maintenance on the subject systems would constitute a potential to affect bypass leakage, Procedure 3.M.4-38, "SBGT Maintenance," will be revised to sequence, in a more timely manner, the necessary post-work testing requirements.

If you have any further questions, please do not hesitate to contact me.

Respectfully submitted,


W. D. Harrington