

December 18, 1996

E. Thomas Boulette, PhD  
Senior Vice President - Nuclear  
Boston Edison Company  
Pilgrim Nuclear Power Station  
600 Rocky Hill Road  
Plymouth, Massachusetts 02360-5599

SUBJECT: PILGRIM INSPECTION REPORT 50-293/96-08

Dear Mr. Boulette:

On November 22, 1996, the NRC completed an inspection at the Pilgrim Nuclear Power Station in Plymouth, Massachusetts. The enclosed report presents the results of that inspection.

During the eight weeks covered by this inspection period, the conduct of activities at the Pilgrim facility was characterized by a strong safety perspective. After completion of the extensive repairs to the "B" RBCCW heat exchanger, we observed operators conduct a well-controlled approach to criticality, plant heat-up and ascension to full power. The nuclear instrumentation (i.e., SRM/IRMs) performed more reliably than during the previous start-up due to extensive diagnostic testing that led to the replacement of two IRM detectors and also an innovative modification to several of the detector connectors to prevent moisture intrusion. After the return to full power, your staff demonstrated effective problem identification and resolution of a malfunctioning feedwater system regulating valve. Thorough preparations, including the development of a specific temporary procedure and mock-up training done both in the maintenance shop and on the operations training simulator, resulted in a well executed repair effort. Lastly, several tangible changes and extensive planning for refueling outage number 11 (RFO11) were observed.

In the previous NRC inspection report (i.e., 96-06), we issued a Notice of Violation for procedure usage and quality issues. Several procedure adherence/quality issues occurred during this period. We identified two procedural adherence issues when electricians used an incorrect crimping tool during safety-related maintenance on MO-1301-48 and also when the instructions of a caution tag hung on a leaking thermowell were not followed. After the exit meeting, Mr. Theodore Sullivan of your staff informed us that long-term efforts were underway to improve overall procedure usage and procedure quality at the Pilgrim station including site-wide briefings with workers and supervisors prior to the start of refueling outage no. 11 (RFO11) scheduled to begin February 1, 1997. We did note the positive actions of an attentive nuclear watch engineer (NWE) who identified improper discriminator

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voltage settings for two source range monitors during the final review of a surveillance test procedure. Lastly, a brief loss of shutdown cooling occurred on September 25, 1996 due to an inadequate procedure that resulted from an incomplete engineering modification impact review. Because of these procedural adherence/quality issues, the NRC remains concerned which re-enforces the importance of your planned actions to improve overall procedural usage and procedure quality.

The inspection of radioactive liquid and gaseous effluent control and the radiological environmental monitoring program (REMP) programs incorporated selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors. The radioactive effluent control and REMP programs at the Pilgrim Nuclear Power Station were considered strong programs overall. Based on the results of this inspection however, one violation of technical specifications requirements was identified involving failure to adhere to the requirements of Technical Specification 4.8.A.1, Table 4.8-1, relative to the sample and analytical requirements for release of the contents of the neutralizing sump. The violation is cited in the enclosed Notice of Violation (Notice), and the circumstances surrounding the matter are described in the enclosed inspection report. While we recognize that the matter was identified by your organization as the result of a sample follow-up activity, the matter is a concern to us since it revealed lack of attention to the applicable technical specification compounded by a deficiency in the implementing procedure. We are aware that subsequent to this inspection, your staff issued Licensee Event Report 96-10, dated November 4, 1996 in response to our inspection findings. LER 96-10 identified the root cause of the violation as a programmatic deficiency and included adequate, immediate and planned corrective actions. As a result, you are not required to respond to this letter unless you choose to do so, or disagree with the violation.

Further, we note that the LER referenced above and other recent LERs involved missed surveillance tests at required frequencies due to inadequacies of your Master Surveillance Tacking Program (MSTP). We understand that you will complete by January 31, 1997, a comprehensive review of the MSTP to assure proper coverage of the facility technical specification surveillances to assure completion at the required frequencies. This commitment date was given in a conversation between Mr. R. Laura of this office and Mr. D. Ellis of your staff on December 16, 1997 at your facility.

Your continued cooperation with us is appreciated.

Sincerely,

Original Signed By:

Richard Conte, Chief  
Reactor Projects Branch No. 5  
Division of Reactor Projects

E. Thomas Boulette, Ph.D  
Boston Edison Company

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

Enclosures:

1. Notice of Violation
2. Inspection Report 50-293/96-08
3. BECo Slides From 10/03/96 Enforcement Conference

cc w/encls:

L. Olivier, Vice President - Nuclear and Station Director  
T. Sullivan, Plant Manager  
N. Desmond, Regulatory Relations  
D. Tarantino, Nuclear Information Manager  
R. Hallisey, Department of Public Health, Commonwealth of Massachusetts  
The Honorable Therese Murray  
The Honorable Linda Teagan  
B. Abbanat, Department of Public Utilities  
Chairman, Plymouth Board of Selectmen  
Chairman, Duxbury Board of Selectmen  
Chairman, Nuclear Matters Committee  
Plymouth Civil Defense Director  
Paul W. Gromer, Massachusetts Secretary of Energy Resources  
James Shaer, Legislative Assistant  
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Office of the Attorney General, Commonwealth of Massachusetts  
T. Rapone, Massachusetts Executive Office of Public Safety  
Chairman, Citizens Urging Responsible Energy  
Commonwealth of Massachusetts, SLO Designee

E. Thomas Boulette, Ph.D  
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