Boston Edison

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

E. T. Boulette, PhD
Senior Vice President – Nuclear

November 7, 1996
BECo Ltr. #96-095

Richard W. Cooper, Director
Division of Reactor Projects
Region I
475 Allendale Road
King of Prussia, PA 15406-1415

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

Subject: DOL Case No. 94-ERA-34

Reference: NRC letter from Mr. Cooper to Mr. Boulette, May 13, 1996

Dear Mr. Cooper:

This letter provides formal closure to the issue raised in your May 13, 1996, letter to us. As explained in the enclosure (BECo letter to Ms. Claro, September 6, 1996), the information presented by BECo in the subject case is consistent with NRC inspection findings referenced in your letter. Furthermore, the letter to Ms. Claro asserts the information presented by BECo in testimony and brief is accurate and complete.

Should you require any further information, please contact me directly at 508-830-8814.

for E. T. Boulette, PhD

JWK/dmc/94ERA-34
Enclosure: BECo letter from Mr. Fulton to Ms. Claro, September 6, 1996

cc: Mr. Alan B. Wang, Project Manager
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September 6, 1996

Joyce Claro, Esq.
Office of Administrative Appeals
U. S. Department of Labor
200 Constitution Avenue, N. W.
Washington D. C. 20210

Subject: Case NO. 94-ERA-34

Dear Ms. Claro,

On May 6, 1996, the U. S. Nuclear Regulatory Commission's (NRC) Office of Enforcement notified your office that Boston Edison Company may have provided inaccurate or incomplete information to the Department of Labor in the Company's brief, dated October 31, 1994, in the above captioned proceeding. The basis for this conclusion is an apparent inconsistency between the findings of a recent NRC inspection conducted at Boston Edison Company's Pilgrim Nuclear Power Station, NRC Inspection Report No. 50-293/95-22 (Section 4.3.4) and a statement contained within the Company's brief, Argument II.G "The June, 1994 Memorandum Regarding Manuals for Safety-Related Systems Had No Safety Significance," (page 14). The purpose of this letter is to advise the Secretary that, in all instances, the information provided by Boston Edison Company in testimony and brief is accurate and complete.

At issue is the use of the term "vendor manuals" and whether or not the documents discussed by the Company in Argument II.G of the Company's brief, are the same documents relied upon to conduct maintenance as concluded by the NRC in its recent inspection. There are different categories of vendor manuals at Pilgrim Station and therein may lie the source of the apparent inconsistency.

A vendor manual is a document provided by the supplier (vendor) of a plant system, sub-system, or component. The vendor manuals referenced in brief are the "system level" vendor manuals. Claimant Exhibit 2. The system level vendor manuals are used solely as a reference for a general system description and, due to their age and the cost to update them, the system vendor manuals have been classified as "Exception" category manuals and are not maintained as current. The vendor manuals that were the focus of the NRC's recent inspection are the sub-system or component level manuals that are active and relied upon to maintain the plant. The system vendor manuals are not relied upon to perform this function. Company procedures explain the differences in the categories and control their specific treatment and use.

It is the Company's position that the information provided in its testimony and brief in the captioned proceeding and the results of the NRC referenced inspection are consistent. Most importantly, the information provided by the Company is both accurate and complete. The Company shall provide any documents or additional information that you may need regarding this matter. Please contact me directly at the above number.

Sincerely,

cc Richard Cooper
Karla Smith, Esq.