

SEP 17 1985

Docket No. 50-293

Boston Edison Company M/C Nuclear
ATTN: Mr. William D. Harrington
Senior Vice President, Nuclear
800 Boylston Street
Boston, Massachusetts 02199

Gentlemen:

Subject: Inspection Report No. 50-293/85-13

We have received your August 15, 1985 letter and your response to the Notice of Violation and Notice of Deviation enclosed with our July 16, 1985 letter.

Thank you for informing us of the correction and preventive actions documented in your letter. The implementation of your short term corrective actions was reviewed during Inspection No. 50-293/85-22 and were found acceptable. Your long term corrective actions were clarified by discussion between Mr. A. L. Oxsen of your office and Mr. R. Nimitz of this office on August 23, 1985, during Inspection No. 50-293/85-13. It is our understanding that a Policy has been established which requires a review of planned projects that involve either unusual radiological hazards/risks or approved contractor procedures to implement. If findings of the project review indicate that procedures are required for the project, procedure requirements and special conditions will be discussed. Also, a plan will be developed to ensure that the required procedures or special conditions are developed and approved prior to implementing the activities requiring the procedures or special conditions. We will review the implementation of these long-term corrective actions during a future inspection.

Inspection 50-293/85-13 also clarified your use of procedural steps as "sign-offs." Although your letter of August 15, 1985 stated that no "sign-offs" were included in the procedures referenced in Inspection Report No. 50-293/85-13, the discussion between Mr. Oxsen and Mr. Nimitz concluded that appropriate health physics "sign-off" steps were included.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Ronald R. Bellamy
Thomas T. Martin, Director
Division of Radiation Safety
and Safeguards

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cc w/encl:

A. V. Morisi, Manager, Nuclear Management Services Department
C. J. Mathis, Station Manager
Joanne Shotwell, Assistant Attorney General
Paul Levy, Chairman, Department of Public Utilities
W. J. Nolan, Chairman, Plymouth Board of Selectmen
Plymouth Civil Defense Director
Senator Edward P. Kirby
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Massachusetts (2)

bcc w/encl:

Region I Docket Room (with concurrences)
Section Chief, DRP

RI:DRSS
Nimitz/mmb

9/ /85

RI:DRS
Pasciak

9/ /85

mt
RI:DRSS
Bellamy

9/16/85

RI:DRSS
Martin

9/ /85

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RL PILGRIM 85-13 - 0002.0.0
09/12/85

BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

August 15, 1985
BECO Ltr. #85-152

Mr. Thomas T. Martin, Director
Division of Reactor Safety and Safeguards
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 Violation and Deviation as
Contained in Inspection Report 85-13

References: NRC Ltr. to Boston Edison, dtd. July 16, 1985

Dear Mr. Martin:

This letter is in response to the Violation and Deviation identified during a routine radiological safety inspection conducted by Mr. R. L. Nimitz of your office on May 20-24, 1985 and communicated to Boston Edison Company in Appendices (A) and (B) of the reference.

Notice of Violation (Appendix A)

Technical Specification 6.8 requires that written procedures and administrative policies be established, implemented and maintained, that meet or exceed the requirements and recommendations of Appendix 'A' of Regulatory Guide 1.33, 1972. This regulatory guide recommends, in part, that procedures for procedure review and approval be prepared. Station approved procedure 1.3.4, "Procedures," requires in Section III.A that approved written procedures be adhered to by all station personnel.

- Procedure 1.3.4, Revision 27, specifies, in part, in Section C.3, that the Operations Review Committee (ORC) indicate its approval of a procedure to be included in Category Three Group procedures.

Contrary to the above, as of May 23, 1985, two procedures, FP-OP-007-442 and FP-OP-008-442, used to provide guidance for cutting of control rod blades and LPRMs, were not presented to ORC for approval as Category Three Group procedures. As a result, the ORC did not indicate its approval of the procedures for use as Category Three Group procedures.

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- Procedure No. 3.M.1-19, Revision 1, "Spent Fuel Pool Cleaning," specifies in Section IV, that the obtaining of a valid Maintenance Request (MR) is a prerequisite for procedure use.

Contrary to the above, as of May 23, 1985, procedure No. 3.M.1-19 was used to provide general guidance for cutting of control rod blades and LPRMs in the spent fuel pool, but no valid Maintenance Request was in effect.

Response

The cause of the subject violation was an isolated case of an error in judgment on the part of the project manager who (1) incorrectly concluded that ORC approval was not required for the two subject procedures, and (2) failed to issue a Maintenance Request for the fuel pool cleanup task. On May 23, 1985, work associated with the spent fuel pool cleanup was stopped. Prior to restarting work, the following corrective steps were taken:

- Chem-Nuclear Procedures FP-OP-008-442 and FP-OP-007-442 were approved by the ORC as Category Three procedures in accordance with PNPS Procedure 1.3.4.
- Procedures associated with the spent fuel pool cleanup were reviewed for consistency and adequacy and changed as appropriate.
- A Maintenance Request was issued for spent fuel cleanup.
- Personnel (BECOs and Contractors) directly involved in the fuel pool cleanup reviewed all procedures associated with the project.
- Pre-shift briefings with BECO and Contractor personnel were initiated and will continue prior to each shift.

The corrective steps listed above were completed and work was started again on the fuel pool cleanup project on May 28, 1985. The above actions satisfactorily corrected the deficient condition. To preclude future violations, the project manager was counseled to pay closer attention to procedural requirements particularly during unusual evolutions such as the fuel pool cleanup.

Full compliance was therefore achieved on May 28, 1985, the date on which corrective actions were completed.

Notice of Deviation (Appendix B)

As a result of the inspection conducted on May 20-24, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following deviation was identified:

- other projects?
- other managers?

No! Job specific.
Need station wide.

Same as CRD problem

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IE Bulletin 80-10 requires, in part, that: 1) a review of facility design and operation be performed to identify systems that are considered as nonradioactive, but could possibly become contaminated through interfaces with contaminated systems; 2) a routine sampling/analysis or monitoring program be established for these systems in order to promptly identify any contaminating events which could lead to unmonitored, uncontrolled, liquid or gaseous releases to the environment, including releases to on-site leaching fields and; 3) the specifics of these reviews be documented and made available to the NRC for review during future on-site inspection efforts. In particular, special consideration was to be given to the instrument air system and the sanitary waste system. The licensee's response to this Bulletin indicated that the above was implemented.

Contrary to the above, as of May 24, 1985: 1) the instrument air system and sanitary waste system had not been reviewed to determine if these systems could become contaminated through interfaces with contaminated systems; 2) no routine sampling/analysis or monitoring program (as appropriate) was established in order to promptly identify any contaminating events which could lead to unmonitored/uncontrolled releases from these systems; and 3) no specifics relative to the above were documented and made available to the NRC.

Response

After discussion of the subject issues at the 5/24/85 exit meeting, Boston Edison took the following corrective steps:

- On 5/24/85, a Special Instruction was issued to the Chemistry technicians, providing them specific instructions for analysis and reporting of results of normally clean systems if found to be radioactive. ✓ OK
- On 5/28/85, a memorandum was issued to the Nuclear Watch Engineers referencing the requirements of the Bulletin and providing specific instructions for action when a normally clean system is found to be contaminated. ✓ OK

As corrective action to avoid further deviations, the Engineering Department has been requested to perform an evaluation of facility design and operation, which will include the instrument air and sanitary waste systems. The results of that evaluation will be factored into existing Station procedures and/or Work Instructions, as necessary.

Full compliance was reached on May 28, 1985, the date on which both the Chemistry technicians and the Nuclear Watch Engineers were provided adequate guidance for action when a normally non-radioactive system becomes contaminated. }
no

Re-review of
IEB 80-10. To be
completed 1/86.

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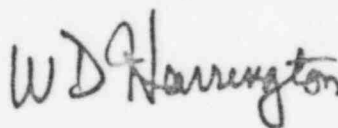
NRC Concerns

To address Mr. Nimitz' concerns as stated on Page (1) of the referenced letter, we would like to emphasize that, although a Maintenance Request was not generated in accordance with the prerequisite requirements of Procedure 3.M.1-19 ("Spent Fuel Pool Cleaning"), we maintained adequate communications and ensured adequate radiological protection of the workers involved through numerous Radiation Work Permits and constant HP coverage of fuel pool cleaning tasks. We have conducted a root cause analysis and have determined that not filling out a Maintenance Request was an isolated instance of failure to follow procedures on the part of the project manager. As mentioned earlier in this report, he has since been counseled on the importance of following Station procedures. Additionally, in order to ensure improved oversight of ongoing radiological work, the Contractor On-Site Assessor has been requested in his reviews to ensure personnel are using appropriately reviewed procedures and are knowledgeable in procedural requirements.

We would also like to correct what appears to be a misconception as reflected on Page 8 of the Inspection Report. The two vendor procedures used to control cutting work contained no specific radiological controls, but provided basic work instructions for the Chem-Nuclear personnel involved in the activities. Neither of the procedures required sign-offs by licensee radiological control technicians. Rather, the technicians stated in the procedure are those of the vendor, Chem-Nuclear.

If there are any questions concerning these matters, please do not hesitate to contact me.

Respectfully submitted,

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

W. D. Harrington