

BOSTON EDISON COMPANY
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

August 7, 1985
BECO Ltr. #85- 141

Mr. Richard W. Starosteki, Director
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region I - 631 Park Avenue
King of Prussia, PA 19406

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

Subject: Revised Response to Violation "A" as
Contained in NRC Inspection Report No. 85-01

References: (a) NRC Ltr. to Boston Edison, dtd. Feb. 20, 1985 (I.R. 85-01)
(b) BECo Ltr. to NRC, dtd. March 22, 1985
(c) NRC Ltr. to Boston Edison, dtd. July 11, 1985

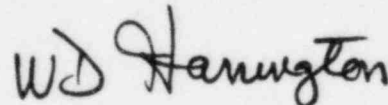
Dear Mr. Starosteki:

This letter is in response to Reference (c) which requests a revised response to Violation "A" as contained in Reference (a) and originally responded to by Boston Edison Company in Reference (b).

Our revised response, therefore, is enclosed as an attachment to this letter.

Should you have any further questions concerning this issue, please do not hesitate to contact me.

Respectfully submitted,



William D. Harrington

Attachment

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ATTACHMENT

NOTICE OF VIOLATION

10 CFR 50.54, Section (m)(2)(iii) requires that a licensed operator or senior operator be present at the controls at all times in addition to a licensed senior operator in the control room (for other than cold shutdown or refueling modes).

Contrary to the above, during the period January 1-31, 1985, the reactor was operating in the startup and run modes and a licensed operator or senior operator was not present at the controls at all times in addition to a licensed senior operator in the control room as evidenced by (1) having only one licensed senior operator at the controls and one licensed operator in the back portions of the control room (back panels, control room kitchen, and bathroom) and (2) having only one licensed operator at the controls and one licensed senior operator in the bathroom (in which the annunciators cannot be heard through a bullet proof door).

RESPONSE

Upon receipt of your letter requesting a new response to the subject violation, Boston Edison has taken the following corrective steps:

- The Watch Engineer's office has been relocated into the Control Room as of July 17, 1985. This will provide an additional Senior Licensed Operator in the Control Room during major portions of all shifts.
- Control Room personnel were briefed on the contents of the subject violation and the associated regulations regarding Control Room staffing requirements. The briefings took place on July 11, 1985.
- Licensed STA's will be used, when necessary, to fulfill the subject staffing requirements.
- Boston Edison is planning to install a dedicated intercom system for the rest room used by Control Room personnel which will provide an additional means of communications.

The combination of the above corrective actions should correct the condition, and satisfactorily preclude recurrence. Results achieved include: (1) a heightened awareness of Control Room staffing requirements on the part of Operations Group personnel, and (2) assurance that when the reactor is in an operational mode other than cold shutdown or refueling, a person holding a Senior Operators License is in the Control Room at all times; and that in addition to this Senior Licensed Operator, a Licensed Operator is present at the controls at all times.

Full compliance was reached on July 11, 1985, the date upon which Control Room personnel were briefed on the subject of staffing requirements.