



Boston Edison

Pilgrim Nuclear Power Station
Rocky Hill Road
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E. T. Boulette, PhD

Senior Vice President — Nuclear

November 20, 1996

BECo Ltr. #2.96- 100

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Docket No. 50-293

License No. DPR-35

SUBJECT: REPLY TO NOTICE OF VIOLATION (REFERENCE
NRC INSPECTION REPORT NO. 50-293/96-09

Dear Sir:

Enclosed is Boston Edison Company's reply to the Notice of Violation contained in the subject NRC Inspection Report. This letter contains corrective action commitments that will upgrade our audit programs.

Please do not hesitate to contact me if there are any questions regarding the enclosed reply.

E. T. Boulette, PhD

DWE/lb/vio96-09

Enclosure 1: Reply to Notice of Violation

cc: Mr. Hubert J. Miller
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Senior Resident Inspector

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REPLY TO A NOTICE OF VIOLATION
NRC VIOLATIONS 59-293/96-09-01, and 02

This response pertains to the NRC inspection report 50-293/96-09. The referenced inspection identified two violations. The violations are summarized below:

10CFR 73.56(g)(1) requires an audit of the Access Authorization Program within 12 months of the effective date of implementation of the program, and at least every 24 months thereafter, to ensure that the requirements of this section are maintained. Contrary to the requirements of Section 73.56(g)(1), the initial audit was performed after 12 months of program implementation and subsequent audits did not address all elements of the Access Authorization Program to meet the 24-month frequency.

10CFR73.56(g)(2) requires each license who accepts the Access Authorization Program of a contractor or vendor to audit contractor/vendor programs every 12 months. Contrary to the requirements of 10CFR73.56(g)(a), it was determined that Boston Edison Company failed to conduct audits of the accepted contractor and vendor Access Authorization Programs every 12 months and could not produce a copy of another utility's audit of the same contractor or vendor.

RESPONSE

The first violation consists of two separate noncompliances. The first noncompliance was failure to perform the initial audit within 12 months of program implementation. As stated in the Notice of Violation, the initial audit of the PNPS Access Authorization Program after program implementation (April 27, 1992) was not conducted until October-November 1993. The cause of the noncompliance was failure of the organization to recognize the program implementation date and schedule the audit appropriately. The initial audit of Access Authorization was incorporated into the audit of Security which was scheduled and performed in the fourth quarter 1993. This noncompliance is acknowledged; however, no specific corrective action can be performed now. The QA Group has, however, performed a thorough review of existing regulations to ensure audit commitments for other functional areas are being met.

The second noncompliance relates to the failure to perform audits every 24 months subsequent to the initial Access Authorization audit. The NRC inspector noted the reliance on limited surveillances resulted in an overall weakness of scope and depth in evaluating program effectiveness. While the NRC concluded that PNPS had an effective Access Authorization Program in place, the failure to audit the program represents a failure to follow NRC requirements. This noncompliance is also acknowledged and was caused by a failure to recognize the requirement for a program audit, as well as inadequate review of the aggregate surveillances to recognize the lack of scope and depth.

The following actions have been taken to correct this noncompliance:

- QA scheduled an audit of the Access Authorization Program to be performed in the fourth quarter 1996. This audit will encompass all elements of the program to evaluate conformance to the applicable regulatory requirements.

The following action has been taken to prevent future noncompliance:

- QA established a separate schedule for the Access Authorization Program audit independent of the Security audit to ensure that the 24-month frequency of 10CFR73.56(g)(1) is met in the future. Further, the audit plan has been revised to ensure that all elements of the program are evaluated in each audit.

The second violation resulted from a failure to conduct audits of the accepted contractor and vendor programs every 12 months. The cause of the violation was failure to provide sufficient oversight of contractor and vendor programs. This violation is acknowledged and the following actions will be taken to correct this situation:

- A complete review and evaluation of accepted contractor and vendor Access Authorization Programs will be performed.
- Active contractor and vendor self-screening programs will be reviewed to ensure current audits were performed in accordance with the requirements of 10CFR73.56.
- Where possible, active contractor and vendor programs will be updated to include the previous 3 years of audit reports.

To preclude recurrence, a tracking system will be developed and maintained to ensure accepted contractor and vendor self-screening programs are audited in accordance with 10CFR73.56.

These actions will be taken prior to our refueling outage, currently scheduled for February 1997. They will ensure the effectiveness of the self-screening contractor and vendor programs. They will also ensure the Access Authorization Program continues to be an effective program.

BH/license/radmisc/vio96-09