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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

November 15, 1985
BECO Ltr, #85-205

Edward C. Wenzinger, Chief
Projects Branch No. 3
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

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

Subject: Response to Violation 85-26-05 as Contained in
NRC Inspection Report 85-26

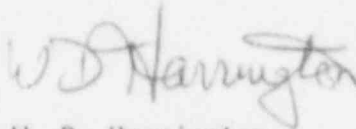
Dear Mr. Wenzinger:

This letter is in response to the subject violation contained in NRC
Inspection Report 85-26, conducted by Dr. M. McBride of your office on August
20, 1985 to September 23, 1985 at Pilgrim Nuclear Power Station.

The subject violation and Boston Edison's response is enclosed as an
attachment to this letter.

If you should have any further questions regarding this matter, please do not
hesitate to contact me.

Very truly yours,


W. D. Harrington

Attachment

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ATTACHMENT

VIOLATION

10 CFR 50 Appendix B, Criterion XVI, "Corrective Actions", requires that conditions adverse to quality be promptly identified and corrected. Procedure No. 1.3.34, "Conduct of Operations", requires in part that the Plant Manager authorize overtime involving safety related activities when work times exceed twenty-four hours in a forty-eight-hour period or seventy-two hours in a seven-day period. The lack of a program to implement overtime authorization requirements for licensed reactor operators who work more than twenty-four hours in a forty-eight-hour period was identified during NRC Inspection No. 50-293/85-01 in January, 1985. In addition, the failure to authorize a licensed reactor operator to work more than seventy-two hours in a seven-day period was identified by the licensee in July, 1985.

Contrary to the above, following NRC inspection No. 50-293/85-01 in January, 1985 and following identification of unauthorized overtime in July 1985, the licensee did not take corrective action to ensure that overtime for licensed reactor operators was subsequently authorized in accordance with the requirements of Procedure No. 1.3.34. Failure to properly authorize licensed reactor operator overtime is a condition adverse to quality. As a result of the lack of licensee corrective action, operators worked unauthorized overtime as follows:

- a. From June 15, 1985 to September 14, 1985 there were 29 instances when licensed reactor operators worked more than twenty-four hours in a forty-eight-hour period without authorization from the Plant Manager. The maximum number of hours worked was 34 hours.
- b. From August 18, 1985 to September 7, 1985, there were six instances when licensed reactor operators worked more than seventy-two hours in a seven-day period without authorization from the Plant Manager. The maximum hours worked was 87 hours.

RESPONSE

The Watch Engineers have primary responsibility for ensuring that the Plant Manager's approval is secured in cases as mentioned in the subject violation. After receiving the subject violation, all Watch Engineers were counseled concerning the above examples of unauthorized overtime. They were reminded of the regulatory concerns and the requirements involved. We are confident that this corrective action (1) has elevated their attention to this matter, and (2) will ensure adherence to the requirements of Procedure 1.3.34 "Conduct of Operations." An audit of overtime worked was conducted on November 1, 1985 to ensure adherence to the requirements, and full compliance was verified.

Additionally, administrative controls have been improved so that the person responsible for hiring for overtime will have adequate information available to make the correct hiring selections that are in compliance with Procedure 1.3.34.

Root cause of this problem is a shortage of licensed operators. Boston Edison Company, in order to ameliorate this condition, has authorized ten additional operator positions for Pilgrim Station. The Company is now actively recruiting for these positions. Ultimately, increasing the complement of licensed operators will significantly reduce the need for excess overtime worked by licensed reactor operators.

Full compliance was achieved on November 1, 1985, the date upon which the above audit was conducted to verify that the proper authorizations for overtime were being secured.