

U. S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT

REGION I

Report No. 50-293/79-20

Docket No. 50-293

License No. DPR-35 Priority -- Category C

Licensee: Boston Edison Company M/C Nuclear  
800 Boylston Street  
Boston, Massachusetts 02199

Facility Name: Pilgrim

Inspection At: Plymouth, Massachusetts

Inspection Conducted: December 3-7, 1979

Inspectors: D. Kehoe  
D. Kehoe, Reactor Inspector

1-4-80  
date

W. Baunack  
W. Baunack, Acting Chief, Nuclear Support  
Section #2, RO&NS Branch

1/7/80  
date

Approved by: William A. [Signature]  
T. T. Martin, Chief, Reactor Projects  
Section #3, RO&NS Branch

date  
1/7/80  
date

Inspection Summary:

Inspection on December 3-7, 1979 (Report No. 50-293/79-20)

Areas Inspected: Routine, unannounced inspection by two NRC Regional Based inspectors (68 hours) of plant operations. A facility tour was conducted.

Noncompliances: One (Deficiency - failure to report in accordance with technical specification requirements, paragraph 3).

## DETAILS

### 1. Persons Contacted

- \*E. Cobb, Chief Operations Engineer
- M. Hensch, Chief Radiological Engineer
- \*R. Machon, Assistant Station Manager
- \*C. Mathis, Methods, Training, and Compliance Group Leader
- P. McGuire, Station Manager
- E. Rourke, Watch Engineer
- K. Taylor, Watch Engineer
- \*R. Trudeau, Health Physics Engineer

The inspector also interviewed other licensee employees including members of the technical and engineering staff and reactor operators.

\*Denotes those present at the exit interview.

### 2. Licensee Action on Previous Inspection Findings

(Closed) Unresolved Item (293/76-29-02) RBCCW offline monitor always alarming due to high background. On April 30, 1979 a new offline detector was installed in accordance with PDCR 77-09. The operation of this detector since that time and a review of the associated data indicate the detector is performing as required. This item is closed.

(Closed) Unresolved item (293/79-01-04) DWEDS operating procedure does not address manual operation which is the mode of operation being used. Revision 4 to DWEDS operating procedure 2.2.71 has added instruction on manual operation of the DWED System. This item is closed.

(Closed) Noncompliance (293/79-04-03): Surveillance test 8.5.1.1 to be revised to require the operations group performing the test to evaluate the results. Revision 5 to Surveillance Test 8.5.1.1 requires the operations group performing the test to verify proper flow rate, proper stroking time for valves and that the high point vent is locked closed at the completion of the test. This item is closed.

(Closed) Noncompliance (293/79-11-02): Failure to satisfy technical specification calibration frequency requirements for PI-5067A, 5067B, and 5021 and the Emergency Bus Voltage relays. Revision 3 to procedure 8.M.2-6.2 added PI-5067A, 5067B and 5021 and specified a 6 month calibration frequency. The Emergency bus voltage relays have been placed on a 15 month frequency pending a Technical Specification revision to perform them on an 18 month frequency. This item is closed.

### 3. Review of Plant Operations

#### a. Plant Tours

The inspectors conducted tours of the accessible plant areas listed below at various times to observe the status of plant systems and conditions and to observe activities in progress. The plant areas inspected included the Control Room, Diesel Generator Rooms, Recirculation Pump MG Set Room, accessible portions of the Reactor Building and the Protected Area Perimeter. The following were among the items observed.

- Radiation controls properly established;
- Housekeeping, including attention to the elimination of fire hazards
- No fluid leaks of significance;
- Pipe vibration, including the condition of hangers and seismic restraints;
- Status of preselected jumpers;
- Equipment tagging for compliance with administrative requirements;
- Control Room manning in accordance with Technical Specification requirements;
- Reasons for lighted annunciators in the Control Room;
- Inspection tags on fire extinguishers, no obstruction of fire hoses, etc.

No items of noncompliance were observed, however, one unresolved item is discussed below.

During the course of the tours the inspectors noted approximately 15-20 danger tags resting loosely on various panels. A sample of six tags was taken and presented to the watch engineer to determine their status. Of the six tags three were listed as active in the watch engineers files. Even though the tags noted were not on safety related systems, the large numbers of tags laying unattached throughout the plant and the apparent failure of the procedure to control those tags identified by the inspectors raised questions as to the adequacy of the tagout program.

The licensee acknowledged the inspector's comments and stated that the tagout program would be reviewed for adequacy and any necessary corrective action implemented by January 5, 1980. This item is unresolved (293/79-20-01).

b. Review of Operating Records

The inspector reviewed the following logs and records:

- Chief Operating Engineers Log, September 4, 1979 to December 3, 1979;
- Daily Log Test 09, November 11, 1979 to November 20, 1979
- Station Operations Log, November 1, 1979 to November 30, 1979
- Jumper and Lifted Leads Log, all active entries;
- Watch Engineers Tagout log, all active entries
- Plant Tagout Log, Tagouts No. 77-3007, 78-2130, 78-2752, 79-2156 and 79-2169
- Failure and Malfunction Reports July 5, 1979 to November 30, 1979

The logs and records were reviewed to verify that:

- Log sheet entries were properly filled out and initiated
- Log entries involving abnormal conditions are sufficiently detailed
- Log book reviews are being conducted by the staff
- Operating orders do not conflict with the intent of the Technical Specifications (TS)
- Jumper Log entries do not conflict with TS
- NRC reporting requirements are satisfied
- Plant operations are in conformance with the Limiting Conditions for Operations (LCO's) of the TS

One item of noncompliance was identified as discussed below:

The inspectors noted that the following occurrences had not been reported in accordance with NRC requirements.

- On July 10 and August 7, 1979 the rise in condenser cooling water temperature between the intake structure and the discharge to the bay exceeded 32°F. Technical Specification 1.A, B of Appendix B requires that the NRC be notified within 30 days of each occurrence of this type.

- On July 5, 1979 the smoke detector in the HPCI room failed placing the plant in a degraded mode with respect to Technical Specification 3.12.A. On August 7, 1979 the loss of the shutdown transformer placed the plant in a degraded mode with respect to Technical Specification 3.9.B.1. Technical Specification 6.9.B.2.b requires the NRC be notified within 30 days of each occurrence which places the plant in a Technical Specification degraded mode.

The licensee stated that each of the above Technical Specification sections requires the NRC to be notified within 7 days if operational status cannot be restored. The licensee further stated that he had interpreted these reporting requirements as superceding the reporting requirements of section 6.9.B.2.b. The inspector stated that nothing in the aforementioned Technical Specification sections relieved the licensee of the reporting requirements of section 6.9.B.2.b, and further, the reports required by Technical Specifications 3.12.A and 3.9.B.1 could also represent the report required by section 6.9.B.2.b, but if they are not required (i.e., the items are repaired in 7 days) the report of section 6.9.B.2.b would still be required.

- During August, 1979 an organizational change which created the position of Assistant Station Manager was implemented. Technical Specification 6.9.B.2.e requires the NRC to be notified within 30 days of any organizational change which constitutes a change to the Technical Specification organization.

The failure to report the above occurrences in accordance with the applicable Technical Specification is an item of noncompliance (293/79-20-2).

#### 4. Unresolved Items

Unresolved items are findings about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance or deviations.

#### 5. Exit Interview

The inspectors met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on December 6, 1979. The inspector summarized the purpose scope and findings of the inspection.