

BOSTON EDISON COMPANY  
GENERAL OFFICES 800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

G. CARL ANDOGNINI  
SUPERINTENDENT  
NUCLEAR OPERATIONS DEPARTMENT

July 11, 1980

BECO Ltr. #80-140

Mr. Robert T. Carlson, Chief,  
Reactor Construction and Engineering Support Branch  
Office of Inspection and Enforcement  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA. 19406

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

Response to IE Inspection #80-16

Dear Mr. Carlson:

Inspection Report #80-16 dated June 12, 1980 contained one item of non-compliance. Boston Edison Company's response to that item is presented as follows:

Infraction

Based on the results of an NRC Inspection conducted on April 21-25, 1980, it appears that one of your activities was not conducted in full compliance with conditions of your license No. DPR-35 as indicated below.

Technical Specifications 6.8.D states that "Written procedures to implement the Fire Protection Program shall be established, implemented and maintained."

Licensee's Procedure No. 8A.6-1, Fire Extinguisher Checks, Revision 5, August 9, 1978 states in part, "Perform a fire extinguisher check on extinguishers once per month...the inspection procedure should determine that:

1. The extinguisher is in its designated place.
2. Access or visibility of the extinguisher is not obstructed...
6. Maintenance record tag is up to date...

Contrary to the above, as of April 25, 1980 fire extinguishers have been either removed from their designated places, or the extinguishers were found to be obstructed by temporary equipment, thus leaving vital plant areas without adequate first aid fire protection. Maintenance record tags on most extinguishers were not up to date.

Response

On April 26, 1980 an unscheduled performance of Surveillance Test No. 8.A.6 was conducted to remedy the deficiencies identified in the Inspection Exit Meeting of April 25, 1980.

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To prevent occurrences of this type in the future the monthly scheduled surveillance procedure 8.A.6 has been revised to:

1. Include the specific checks of extinguishers listed below:
  - a. in its designated place,
  - b. is conspicuous,
  - c. that access to it is not obstructed in any way,
  - d. that it has not been actuated and partially or fully emptied,
  - e. that it has not been tampered with (seals or tamper indicators not broken,
  - f. that it has not sustained any obvious physical damage or been subjected to adverse environment conditions which could interfere with its operation (such as corrosive fumes) and,
  - g. if the extinguisher is equipped with a sight gage to indicate operability and tamper indicators, or both, that each shows conditions to be satisfactory.
  - h. the inspection tag (BECO Form 2088) is attached and completed to show the most recent quick check and maintenance inspection or replacement (change). The extinguisher serial number should be indicated beside the PNPS number on the inspection tag and on Form 8.A.6.A. Quick check inspections should indicate "M" under the inspection column whereas maintenance inspections or replacement should indicate "SA" (semi-annual).
2. Include a maintenance overhaul of the fire extinguishers on a six month basis.

The above corrective measures are currently in effect.

We trust these actions are responsive to your concerns, however, should you desire additional information please contact us.

Very truly yours,

