

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

G. CARL ANDOGHINI  
SUPERINTENDENT  
NUCLEAR OPERATIONS DEPARTMENT

July 15, 1980

BECo Ltr. #80-144

Mr. Eldon J. Brunner, Chief  
Reactor Operations and Nuclear 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 #80-20

Dear Mr. Brunner:

Inspection Report #80-20 dated June 4, 1980 contained two items of non-compliance. Boston Edison Company's response to those items and our position relative to an NRC finding in Section 3.1, (Future Test Schedule) is presented below.

Infractions

- A. 10 CFR 50, Appendix J, Section III.A.1.(a), states that, "During the period between the initiation of the containment inspection and the performance of the type A test, no repairs or adjustments shall be made so that the containment can be tested in as close to the 'as is' condition as practical."

Contrary to the above, during the type A test, one repair and one adjustment to the containment isolation boundary were made without measuring (quantifying) the "as found" leakage. They are:

1. Attempted repair (tightening) of a leaking 8 inch pipe flange on the RCIC Turbine exhaust line on May 5, 1980.
2. Made adjustment by closure of valve AO 5033A in the Containment Atmospheric Control System on May 6, 1980.

- B. 10 CFR 50, Appendix J, Section IV.A, requires that any modification or replacement of a component which is part of the primary reactor containment boundary be followed by the applicable type leakage rate test.

Paragraph VII.E of PNPS Procedure No. 8.7.1.3, Local Leak Rate Test, states that, "Whenever maintenance is performed on any of the tested valves, seals, or penetrations which affect their leak tight integrity, such valve, seal, or penetration must be retested..."

Contrary to the above, an 8 inch pipe flange on the RCIC Turbine exhaust line, which is part of the primary reactor containment boundary, was disassembled for maintenance on May 2, 1980 and not retested. Leakage from this flange subsequently contributed to the failure of the type A test to meet its acceptance criteria on May 5, 1980.

8009190 076

Mr. Eldon J. Brunner

July 15, 1980

Page 2

Response

Although procedural controls (Procedure 8.7.1.3 "Local Leak Rate Test" and Procedure 8.7.1.4 "Primary Containment Integrated Leak Rate Test") in effect at the time do address these occurrences, it was concluded that these controls should be revised to provide more specific direction for cases where work has been performed on the containment isolation boundary. Therefore to prevent recurrences, corrective actions will be implemented as follows:

- A. 1. Procedure 8.7.1.4 will be revised to clearly specify what actions are to be taken by the test director upon discovery of unidentified leakages and deviations from valve lineups and positions. These actions will be implemented prior to the next PCILRT.
  2. The maintenance staff will be provided with guidance on which valves and seals require post work testing under Procedure 8.7.1.3 by August 30, 1980. Additionally, administrative controls will be initiated regarding the LLRT program which will require that during outages, all work performed on containment penetrations be checked for applicability to the LLRT program. These controls will be in effect prior to initiation of our next LLRT.
- B. The corrective actions stated above assure future compliance with Appendix J and Station Procedure 8.7.1.3

However, relative to the NRC finding in Section 3.1, Future Test Schedule which stated in part; "The inspector noted that the initial attempt of the 1976 and 1980 periodic Type A test at Pilgrim failed to meet the acceptance criteria and that the licensee was therefore subject to the increased frequency of tests as described above," we offer the following:

The intent of the acceptance criteria established for Appendix J Type "A" testing is to assess overall degradation of the primary containment by obtaining an overall leakage rate from the summation of leakage through all potential leakage paths. This in turn assures that proper maintenance and repairs are made to maintain the integrity of the containment during its service life. The initial pressurization of 5/5/80 identified a failure of the Type "B" test program but not a degradation of the primary containment boundary. Our evaluation of the test results will be contained within the PCILRT 90 day report.

We trust this letter is responsive to your concerns, however, should you desire additional information, please contact us.

Very truly yours,

