

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

A. V. MORISI
MANAGER
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

February 5, 1981

BECO Ltr. #81-17

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 No. 80-29

Dear. Mr. Brunner:

IE Inspection Report No. 80-29, dated January 15, 1981 contained two items of non-compliance. Boston Edison Company's response to those items is presented below.

A. Infraction

Technical Specification 6.13 states in part that "Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of 6.13A above, and in addition, locked doors shall be provided to prevent unauthorized entry into such areas.

Contrary to the above, on October 16, 1980 the access door, No. 41, to the Condensate Bay, a posted High Radiation Area in which the intensity of radiation was greater than 1000 mrem/hr was unlocked.

Response A

1. Upon notification the door was pulled closed and locked by Health Physics. The automatic door closer was found to be inadequate and a Maintenance Request was submitted to accomplish repair of the door closer. The Maintenance Request was completed on October 30, 1980.
2. a. Other automatic door closers were checked for adequate operability. Maintenance was notified of additional inadequate door

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closers and these were subsequently repaired.

- b. An operability check of the automatic door closers was added to the Extended RWP Audit to ensure periodic functional tests and repair as appropriate.
- c. The contractor personnel who were responsible for ensuring that the Condenser Deck door was locked when they left the area were given written warnings by the Contract Project Manager.

B. Infraction

Technical Specification 3.1 specified that the trip setting of the Main Steam Line High Radiation monitors be:

" ≤ 7 x Normal Full Power Background"

Technical Specification 3.1 further specifies in Table 3.1.1 that "if the minimum number of operable instrument channels cannot be met for both trip systems, the appropriate actions listed below shall be taken." (for Main Steam Line High Radiation Instruments actions A or C).

- a. Initiate insertion of operable rods, and complete insertion of all operable rods within four hours.
- c. Reduce turbine load and close main steam isolation valves within eight hours.

Contrary to the above, on October 14, 1980, the reactor had been operating at power for greater than 8 hours without the above actions being taken and with all four Main Steam Line High Radiation trip settings greater than seven times full power background.

Response B

1. Following a review of this event, the ORC concurred that on October 2, 1980 a RPS trip level setting was adjusted to a non-conservative level. The review concluded that as a result of a calculation error the Main Steam Line High Radiation Monitors 1705-2A,B,C,D were set to 7.7 times normal full power background.

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On October 14, immediately following identification of this error, the monitors were recalibrated.

2. To preclude a repetition of this event, a revision of procedure number 7.4.14, entitled "Source Calibration of Main Steam Line High Radiation Monitors" was processed. This change will more clearly delineate the method for calculating set points for these instruments.

Full compliance for these items has been attained.

We trust that these responses are satisfactory, if you have any further questions regarding these events, please contact us.

Very truly yours,

Arnold