

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

PILGRIM NUCLEAR POWER STATION

REGION I EVALUATION BOARD MEETING

* Facility: Pilgrim Nuclear Power Station

Licensee: Boston Edison Company

Unit Identification:

<u>Docket No.</u>	<u>License No./Date of Issue</u>
50-293	DPR-35 June 1, 1972

Reactor Information:

NSS General Electric Company

MWT: 1998

Assessment Period: January 1, 1980 ~ December 31, 1980

Evaluation Board Meeting Date: February 24, 1981

Review Board Members:

- B. Grier, Director, Region I
- J. Allan, Deputy Director, Region I
- E. Brunner, Chief, RO&NS Branch, Region I
- R. Carlson, Chief, RC&ES Branch, Region I
- W. Martin, Chief, Safeguards Branch, Region I
- P. Knapp, Chief, Radiation Support Section, FF&MS Branch, Region I

Other NRC Attendees:

- T. Martin, Chief, RPS No. 3, RO&NS Branch Region I
- J. Johnson, SRI, Pilgrim

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PILGRIM NUCLEAR POWER STATION

LICENSEE PERFORMANCE DATA

Assessment Period: January 1, 1980 - December 31, 1980

A. Number and Nature of Noncompliance Items

1. Noncompliance Category

Violations	2
Infractions	20
Deficiencies	4
(Deviations	2)

2. Areas of Noncompliance

	VIO/INF/DEF			
Plant Operations	0	0	1	
Refueling Operations	1	1	0	
Maintenance	0	1	1	
Surveillance	0	3	0	
Licensed Operator Training	0	0	1	
QA/QC	0	0	0	
Reporting	0	0	1	
Committee Activities	0	0	0	
Procurement	0	0	0	
Fire Protection	0	1	0	
ISI/IST	0	0	0	
Design Changes and Modification	0	0	0	
Radiation Protection	0	8	0	
Environmental Protection	0	0	0	
Emergency Preparedness	0	0	0	
Radioactive Waste Management	0	0	0	
Transportation	1	0	0	
Security and Safeguards	0	4	0	
Management Controls	0	2	0	*
 Totals	 2	 20	 4	

(* 2 Deviations are also attributable to management controls)

PILGRIM NUCLEAR POWER STATION

LICENSEE PERFORMANCE DATA

Assessment Period: January 1, 1980 - December 31, 1980

B. Number and Nature of Licensee Event Reports

1. Type of Events

A. Personnel Error	7
B. Design, Manufacturing, Construction, Installation	9
C. External	0
D. Defective Procedure	4
E. Component Failure	32
X. Other	43
Total	95

2. Causally-Linked Events

18 events in 12 groups
(not including the initial event or initial information)

Total Number Events/Month $\underline{TNE} = 1.5$ events/mo

Largest Number Events in the chain $\underline{LNE} = 4$ (environmental)
(not including initial event/info) 2 all others

Average Time between Events ATBE = 3.4 months
for all chains
(ABTE for each chain ranged from 3 weeks to 11 months)

3. Licensee Event Reports Reviewed (Report Nos.)

80-01 through 80-95

C. Escalated Enforcement Actions

1. Civil Penalties

- (a) 2/15/80 Proposed imposition of CP (\$5000) for shipping radioactive materials with external radiation levels in excess of regulatory limits.
- (b) 7/8/80 Proposed imposition of CP (\$13,000) for events surrounding movement of fuel without secondary containment. Amended notice of proposed imposition CP was sent on 10/30/80 associated with an amended notice of violation. Final response to the licensee is in preparation.

2. Orders

- (a) 1/2/80 Confirmatory order to implement Category 'A' items in NUREG 0578
- (b) 2/21/80 Confirmatory order to install a recirculation pump trip
- (c) 9/12/80 Order modifying license requiring information pertaining to IEB 79-01B be submitted to NRC
- (d) 10/2/80 Confirmatory order to install a scram discharge continuous monitoring system
- (e) 10/24/80 Order modifying license and tech spec's requiring records for environmental qualification and specifying date for full qualification.

3. Immediate Action Letters

- (a) 2/27/80 Emergency Preparedness concerns resulting from HP Appraisal Inspection
- (b) 3/11/80 Fuel handling incident concerns - moved fuel without secondary containment
- (c) 9/19/80 Operability of the Standby Gas Treatment System following missed surveillance - laboratory analysis of charcoal
- (d) 10/2/80 Concerns following reactor trip and resulting transient
- (e) 10/8/80 Malfunctions of A and D Safety Relief Valves (SRV) during two recent depressurizations
- (f) 10/31/80 Inadvertent opening of A SRV due to nitrogen supply pressure
- (g) 11/18/80 Completion of three TMI Category A items
- (h) 11/28/80 Control of overtime hours for licensed operators

D. Management Conferences Held During Past Twelve Months

None - Other than site meeting 2/7/80 to discuss facilities for and the assignment of resident inspectors.

E. Licensee Activities

Pilgrim was shutdown from January - May, 1980 for a refueling/modification outage. Major outage activities included NSSS and BOP equipment overhaul, torus modifications, installation of TMI Category 'A' items, an ATWS recirculation pump trip and an ILRT. Critical testing was initiated on May 16, 1980 and power operation was conducted throughout the remainder of 1980 assessment period.

Major organizational and personnel changes were implemented in September, 1980. The position of Nuclear Operations Department Manager was deleted. The Nuclear Operations Support Department was created with the Nuclear Operations Manager - Pilgrim Station (Station Manager) reporting directly to the Vice President - Nuclear. Additional on-site positions were added to assist the Station Manager.

F. Inspection Activities

During the period, 29 inspections have been conducted under the operating reactor program. These have included 14 routine and 6 special (including the Health Physics Appraisal) inspections by the Region I staff, 2 inspections at the Barnwell, South Carolina waste burial site by the Region II staff, and 7 inspections by the Resident Inspector. The assessment period included approximately 1950 inspection man-hours.

The resident inspector's office was established on-site, in June, 1980 with two inspectors assigned and from October, 1980 to the present with one inspector assigned.

G. Investigation Activities

Two investigations were performed during this period; one concerning allegations of shipped and buried spent fuel assemblies and one concerning miscellaneous allegations (in local newspapers) of alcohol and drug abuse. These allegations were not confirmed and no items of noncompliance resulted from these investigations.

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INSPECTION PROGRAM CHANGES

Inspection Time and/or Scope Change
From Prescribed Inspection Program

<u>Functional Area</u>	<u>Increase</u>	<u>No Change</u>	<u>Decrease</u>
1. Plant Operations		X	
2. Refueling Operations	X		
3. Maintenance		X	
4. Surveillance		X	
5. Licensed Operator Training		X	
6. QA/QC		X	
7. Reporting	X		
8. Committee Activities		X	
9. Procurement		X	
10. Fire Protection		X	
11. ISI/IST		X	
12. Design Changes and Modifications		X	
13. Radiation Protection	X		
14. Environmental Protection		X	
15. Emergency Preparedness	X		
16. Radioactive Waste Management		X	
17. Transportation		X	
18. Security and Safeguards		X	
19. Management Controls	X		

Royce H. Ernst
Regional Director

February 24, 1981
Date