

BOSTON EDISON COMPANY
GENERAL OFFICES 800 BOYLSTON STREET
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A. V. MORISI
MANAGER
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

March 24, 1981

BECo. Ltr. #81-65

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 #81-01

Dear Sir:

Inspection #81-01, dated February 19, 1981, contained three items of non-compliance. Boston Edison Company's response to those items is presented as follows:

Violation A.

Section 1.0 U of the Technical Specifications states in part that, "Unless otherwise stated in these specifications, periodic surveillance tests,... shall be performed within the specified surveillance intervals,"

Contrary to the above the surveillances required by Technical Specifications 4.12.C.1 and 4.12.C.2 were not performed within the specified time interval for the charcoal filter bed fire protection spray system in the Standby Gas Treatment System.

Response

As a result of missing this surveillance, a fire patrol was established in accordance with the Technical Specification Requirements. To avoid any future items of non-compliance, modifications will be made to this system and Technical Specification changes will be submitted to enable surveillance performance specific to this type of fire suppression system. The fire patrol will continue until these modifications are completed or until a substitute remote fire monitoring system with direct alarming in the control room is available. The system modifications are currently scheduled for completion during our next refueling outage, which coupled with a timely Technical Specification change will put us in full compliance.

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Violation B.

PNPS Procedure 1.5.3 "Maintenance Requests" requires identification of the supervisory personnel who reviewed a completed M.R. package and the individuals performing maintenance and post-maintenance testing. Several examples of failure to identify these individuals on Maintenance Requests were noted.

Response

To prevent recurrences of this type watch engineers and operating supervisors have been instructed to review this item of non-compliance and the requirements of PNPS Procedure No. 1.5.3. To assist station management in controlling the completion of documentation for M.R.'s and other office functions, a full-time Boston Edison clerical worker has been assigned to the Station's Operation's Group. Full compliance for this item will be achieved by May 1, 1981 when indoctrination of an individual into the functions of this job is completed.

Violation C (Part 1)

PNPS Procedures 2.M.1-103, 3.M.4-19, 8.M.3-4 and 2.4.1 have not been reviewed within two years as required by Station Procedure Number 1.3.4.

Response C (Part 1)

A review of the aforementioned procedures has been undertaken and will be completed by April 4, 1981. A review of all station procedures was made and any procedures, which were identified as having exceeded their two year review date, were submitted to applicable personnel for review. This review will be completed by May 1, 1981. The need for better controls of two year procedure review has been identified and a system to assure all Station Procedures are reviewed every two years is in the developmental stage. The system will be in place by June 1, 1981.

Violation C (Part 2)

Quality Assurance Procedure 2.01 has not been reviewed within two years as required by Station Procedure Number 1.3.4.

Response C (Part 2)

The Quality Assurance Department (QAD) was requested to review this item of non-compliance to determine what corrective action, if any, should be initiated. Following their review QAD indicated that the two year procedure review required by Station Procedure 1.3.4 relates only to PNPS procedures. QA Procedure 2.01 is not classified as a PNPS procedure; thus, review thereof is not controlled by PNPS 1.3.4.

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

Very truly yours,

