

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

A. V. MORISI
MANAGER
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

June 16, 1981

BECO. Ltr. #81-128

Mr. Eldon J. Brunner, Chief
Projects Branch #1
Division of Resident & Project Inspection
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA. 19406

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

Supplementary Response to IE Inspection 81-02

Dear Sir:

The following is a revision of our responses regarding IE Inspection 81-02 (BECO. Ltr. #81-90, April 27, 1981). We regret that, due to a variety of circumstances, the original date given has proved unattainable. An explanation and revised dates follow:

Item B.2 Station Procedure 1.3.7, Revision 17, "Records", Section III.A.1.a, requires the off-going Watch Engineer to summarize the overall operation of the plant during his watch in the Station Operations Log.

Contrary to the above, on January 13, 1981, a summary of the overall operation of the plant was not being entered in the Station Operations Log at the end of each shift.

Response B.2

The requirement to summarize the overall operation is redundant to the ongoing log kept during the watch and will therefore be deleted from Procedure 1.3.7. Until the procedure can be revised, instructions have been given to the Watch Engineers to review the procedure and comply. The procedure will be revised by June 1, 1981.

Revised Response B.2

The revision to this procedure is in the review process prior to being presented to the ORC for its final approval. No problem is anticipated. A July 1, 1981 date should be sufficient.

Item B.3 Station Procedure 7.9.2, Revision 9, "Liquid Radioactive Waste Discharge", Section VIII.B, requires the Watch Engineer to personally supervise the lineup of valves for the tank to be discharged, check off such verification on the liquid radwaste discharge permit, and in addition, to sign form OPER-28. "Liquid Radwaste Release Valve Lineup Check".

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Contrary to the above, the OPER-28 valve lineup check sheet used for a radioactive liquid discharge of the "C" monitor tank on January 20, 1981 was not signed by the Watch Engineer prior to the discharge.

Response B.3

This violation occurred because OPER-28 is not a part of Procedure 7.9.2 and the procedure which addresses the OPER-28 (2.1.17) does not stipulate the same requirements for the Watch Engineer as 7.9.2. Instructions were given to the Watch Engineers to review the requirements for the OPER-28. This conflict in procedures will be revised by June 1, 1981.

Revised Response B.3

The revision to this procedure was approved by the ORC on June 3, 1981.

Item C.1 Boston Edison Company QA Manual, Volume II, Operation of Nuclear Power Plants, Section 5 (revised August 6, 1979) requires that station quality assurance program related procedures be submitted to the QA Manager for review and approval, to be subsequently reviewed and approved by the Station Manager or his designated alternate.

Station Procedure 1.3.4, Revision 21, "Procedures", Section III.D., states that each procedure title page contains a space for the signature of the QA Manager when applicable.

Contrary to the above, on January 23, 1981, seven Station QA Program related procedure revisions had been approved and distributed for use at the Station without being approved by the QA Manager.

Response C.1

To prevent a recurrence of this event, the particular procedures which require QA department review have been highlighted in the station's procedure status log book; in addition, QA identified procedures, which are processed through the word processing system, have been updated to require the QA Manager's review.

Immediate corrective action was initiated for these procedures by issuing the procedures, replete with the latest revisions to QA for review and approval. QA has reviewed these procedures and submitted recommendations for their revision. These recommendations are being reviewed.

Full compliance to this item of non-compliance will be achieved by June 1, 1981.

Revised Response C.1

After a review of the QAD recommendations, new revisions to the procedures had to be drafted, reviewed and comments resolved. This necessitated a delay in full compliance to which we had committed. A few problem areas still exist but we expect these will be solved by July 15, 1981.

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Notice of Violation D

Technical Specification 6.8.A requires that "procedures be established, implemented, and maintained that meet or exceed the requirements and recommendations of ... USNRC Regulatory Guide 1.33 ... "Regulatory Guide 1.33, Appendix A, Section 5, includes procedures for alarm annunciators.

Station Procedures 2.3.1, Revision 3, "General Action (Alarm Procedures)", Section III, states that a nuisance or malfunctioning alarm may be silenced by pulling the alarm card, provided that a yellow tag is placed on the annunciator window with the following information: date, maintenance request number, and Watch Engineer's name. An entry in the Control Room Log indicating this action is also required. Section III further states that an erratic alarm because of operation at the setpoint does not require a maintenance request number but is required to be replaced when the parameter is no longer on the alarm setpoint. An entry in the Control Room Log Book is required any time these actions take place.

Contrary to the above, on January 14, 1981, there were twenty-two control room annunciator panel alarms silenced with their cards pulled with no evidence of log entries being made in the Control Room Log Book. Sixteen of these had no maintenance request number entered on the yellow tag attached to the alarm window.

Response

Efforts have been instituted to correct the pulled annunciator alarms through the MR and PDCR processes. In addition, station procedure 1.3.18 will be revised to include listing of annunciators that have been silenced, the reason why they have been silenced, and corrective action taken. This revision will be completed by June 1, 1981.

Revised Response

In the course of revising the Procedure 1.3.18, a decision was made to expand the revision effort to combine a number of procedures into a single procedure. This is now in the final stages and the review process is to begin shortly. The revised completion date is July 15, 1981.

If you should need any further information concerning this matter, please do not hesitate to contact us.

Very truly yours,

A. Morris