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A. V. MORISI
MANAGER
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

September 14, 1981

BECo. Ltr. #81-220

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

Response to IE Inspection #81-13

Dear Sir:

The following are Boston Edison's responses to items identified in IE Inspection #81-13, NRC Letter of August 13, 1981:

Appendix A, Item A

Technical Specification 6.8.A states that "Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972..." Section 5.1 of ANSI N18.7-1972 requires that written administrative policies shall be provided to control the issuance of documents, including changes, that prescribe activities affecting safety-related structures, systems, or components..."

Station Procedure No. 1.5.3, "Maintenance Requests", Revision 13, requires that "...plant modifications shall be implemented with the requirements of the 'Approved for Implementation' Plant Design Change Request (Procedure 1.3.13)". Procedure No. 1.3.13, "Plant Design Changes", Appendix B, states that "the proper method of handling...field revisions is discussed in Procedure 1.3.27". Procedure No. 1.3.27, "Field Revision Notice", Revision 5, Section VI, states that "upon receipt of an approved FRN, the implementing group may then implement the change in accordance with the previously approved PDCR Package."

Contrary to the above, between July 23, 1980 and July 24, 1980, an unapproved modification was implemented under Maintenance Request No. 80-468 which resulted in cutting out check valves from two one-inch nitrogen supply lines and welding caps on the lines. The approved modification (FRN 80-21-21, dated July 21, 1980) specified the removal of these two check valves and the replacement of the appropriate piping sections to maintain system continuity and integrity.

Response

The modifications made to the 2" nitrogen supply lines under the unapproved FRN were removed, and the design changes originally specified for implementation

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were completed utilizing an approved FRN in accordance with procedure 1.3.27 by June 3, 1981.

All BECo personnel involved in the FRN development and approval process are being provided with copies of Procedure 1.3.27 and a memo which clarifies and reiterates the proper utilization of the FRN, reemphasizes the need for adherence to the procedural requirements, and includes a description of the events which led to the subject item of noncompliance.

In the cover letter to Inspection #81-13 you requested additional information relative to our actions and plans to improve the effectiveness of our management control system. As noted in the text of this inspection report, this topic was discussed by our management at the June 18, 1981 meeting held at NRC headquarters with NRR and IE management personnel. A draft copy of our planned Integrated Work Management Program was provided for your review at that meeting. Since then, portions of the draft IWMP have been incorporated into the Refueling Outage Manual for implementation during our refueling outage, scheduled to commence on September 26, 1981. Copies of both the draft IWMS, and the Refueling Outage Manual are, of course, available for review by your resident inspector. It is for the express purpose of ensuring the proper degree of management control over all aspects of licensing, design procurement, modifications and operation of Pilgrim Station that Boston Edison Company has committed to establishing the IWMS. Should you desire any additional information concerning this process, please do not hesitate to contact us.

Appendix A, Item B

Technical Specification, Sections 3.8.A.b through 3.8.A.4.d, require that, during release of radioactive wastes, the following conditions shall be met: the gross activity monitor and recorder on the radwaste effluent line shall be operable; the effluent control monitor shall be set to alarm and automatically close the waste discharge valve prior to exceeding the limits specified in 3.8.A.1 above; and the liquid waste activity and flow rate shall be continuously monitored and recorded during release.

Contrary to the above, on June 9, 1981, a radioactive liquid discharge of the Waste Neutralizing Sump was made (licensee's permit No. 81-07) to the discharge canal without passing through the radwaste discharge line and therefore without being continuously monitored and controlled by the gross activity monitor, recorder, automatic closing valves, and without the flow rate being continuously recorded.

Response

PNPS respectfully wishes to disagree with the conclusion specified by I&E regarding the alleged notice of violation.

The neutralizing sump is a 20,000 gal. tank located beneath the 23' elevation floor in the auxiliary building. The purpose of this sump is to provide a means for the collection and neutralizing of the regenerant solution used in the plant

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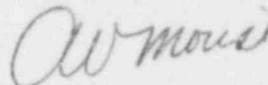
make-up demineralizing system. As necessary, the sump is mixed, sampled, and analyzed for discharge to the environs relative to applicable EPA limits.

Such a sequence of events took place on 6/9/81. One of the tests performed on the sample, per Procedure 7.9.5, is a gross gamma count. According to the procedure, "When gross gamma counts exceed the 3 sigma counting error, the batch is to be considered radioactive waste..." The gross gamma count was 4.5 ± 16.2 cpm/ml. The waste was not radioactive but was erroneously labelled as such and discharged under Liquid Discharge Permit #81-70 on 6/9/81 (from 1815 to 2025).

However, the concern addressed in this inspection item is the discharge of radioactive waste without satisfying the four conditions specified in Technical Specification 3.8.A.4. This is not the case when using the neutralizing sump process. The neutralizing sump is utilized as the point of discharge rather than pumping to radwaste through the process buildings, which requires temporary hoses and poses the potential of contaminating the radwaste process systems with chlorides. This mode of operation fulfills the intention of Tech. Spec. 3.8.A.4 since: 1) a complete isotopic analysis is done prior to release, 2) no other sources of contamination are allowed during the discharge, and 3) the dilution flow is known. Therefore, we feel that our management control systems addresses and our current license permits this evolution.

We feel the above responses satisfactorily address the items identified in IE Inspection #81-13. Should you have any questions concerning these responses after reviewing them, please contact us.

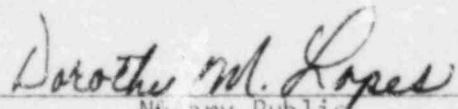
Very truly yours,



Commonwealth of Massachusetts
County of Suffolk

Then personally appeared before me A. Victor Morisi, who, being duly sworn, did state that he is Manager, Nuclear Operations Support of Boston Edison Co., the applicant herein, and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My Commission expires: *July 6, 1984*



Notary Public