

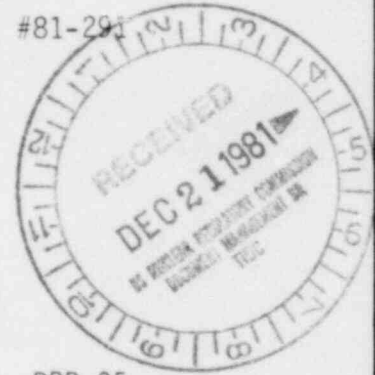
BOSTON EDISON COMPANY
GENERAL OFFICES 800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

A. V. MORISI
MANAGER
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

December 10, 1981

BECo. Ltr. #81-291

Mr. Thomas A. Ippolito, Chief
Operating Reactors Branch #3
Division of Operating Reactors
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555



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

TMI NUREG 0737 Commitment Changes

- References: (a) Telecon discussion M. Williams (NRC)
and J. Keyes (BECo) dated November 9,
1981
- (b) BECo Letter #81-01 dated January 5,
1981

Dear Sir:

As a result of a recent internal BECo audit on commitments made regarding TMI Task Action items, two items (a.A.1.1 STA Training and II.B.4 Training in Mitigation of Core Damage) were discovered with implementation processes other than those originally committed to. Notification of these deviations was presented to your office via Reference (a), the specific details of which are as follows:

1.A.1.1 STA TRAINING

COMMITMENT: Training in Abnormal Events would be 80 hours, and Control Room Management would be 40 contact hours. (Ref. (b))

DEVIATION: STA Training in Abnormal Events was 40 hours and Control Room Management was 24 contact hours.

REASON: Originally, General Electric Company offered the Abnormal Event Analysis course as a two-week course (80 hrs.). This course length was based on their estimate of the material to be covered and was made before the course was actually taught and before the INPO Guidelines were made.

The INPO Guidelines when issued identified 30 hrs. of class-time in Abnormal Analysis training. General Electric Co.'s experience after delivering several programs was that the material could be covered in a 1 week (40 hr.) course.

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This 40 hr. course is representative for training presented at Pilgrim Station.

Additionally, the Control Room Management course originally scoped for 40 contact hours was reduced to 24 contact hours, the same basis used for the reduction of the abnormal events course is applicable to this course. Supplementary justification for reducing the duration of the Control Room Management course is that all of the PNPS STA's have been actively serving in the STA position for more than 12 months so that on the job activities have supplemented formal training in Control Room Management.

II.B.4 TRAINING IN MITIGATION OF CORE DAMAGE.

COMMITMENT: All Station Operating personnel from the Plant Manager through the operating chain to the licensed operators will be trained on the use of installed systems and equipment to mitigate core damage. The program is scheduled for initial implementation by 4/1/81 and completion by 10/1/81.

DEVIATION: All persons identified as needing training were trained by 10/1/81 with 4 exceptions, Station Manager, 2 Deputy Station Managers, 1 Control Room Supervisor.

REASON: Pilgrim Station shutdown for refueling on 9/26/81 with a projected return date of mid-January, 1981. The prerefueling outage planning and subsequent implementation efforts imposed substantive work loads on these particular individuals, which as a result, prevented them from attending the required training.

These individuals will, however, receive this training prior to startup from the refueling outage.

We trust these actions are acceptable and we shall continue to keep you informed if other discrepancies are discovered during our implementation of these NUREG 0737 items.

Very truly yours,

John M. Fultz
SAC ARM