

BOSTON EDISON COMPANY  
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

May 11, 1982

BECo Ltr. #82-120

Mr. Ronald C. Haynes, Director  
Region I  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

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

Dear Sir:

In your April 23, 1982 letter you requested specific information concerning measures which Boston Edison Company (BECo) is taking with respect to the Performance Improvement Plan (the Plan) transmitted to your office on March 18, 1982 in response to the NRC Order Modifying License Effective Immediately. Our response to each of your requests is provided in the following paragraphs:

Corrective Action Program (Item III.I.C of the Plan)

The program revisions referred to in paragraph III.I.C are in fact the short term improvements listed as a milestone for completion by July 1982.

We anticipate that additional definition of program scope and schedule will be identified in the near future as the primary actions emanating from the Management Analysis Company's (MAC) recommendations begin to be incorporated.

The October 1983 milestone for implementation of the revised system is scheduled to assure program completion prior to the commencement of the 1983 refueling outage. An earlier schedule milestone may result from the Action Plan developed from MAC's recommendation.

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Mr. Ronald C. Haynes

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May 11, 1982

Preventive Maintenance (Item III.3.D of the Plan)

The interim preventive maintenance program identified as a milestone for development and implementation in August 1982 is a pilot program for the integrated preventive maintenance program identified in the final milestone. A selected group of major components chosen from the recently completed Master Mechanical Equipment List data base shall serve as the basis for the interim program in conjunction with selected data from the surveillance testing program, corrective maintenance program, equipment qualification effort and ASME Section II requirements. The interim program will be gradually expanded and integrated to encompass all aspects of the comprehensive maintenance program elements.

Configuration Management Systems (Section II of the Plan)

We have completed a review of modifications installed during the outage, and a physical walkdown of safety systems. In addition, we are nearing completion on the FSAR update and as part of this FSAR effort a sample of approximately 5000 Maintenance Requests implemented during outages was selected and reviewed to determine possible modification applicability. The data from each of these efforts will be assessed in conjunction with the results of the MAC diagnostic to determine further plans to address this issue.

The physical walkdown of safety systems and resolution of identified discrepancies during March/April 1982 required a concentrated, heavily manloaded effort to complete within this short timeframe. The remainder of planned system walkdowns are being pursued on a schedule which facilitates completion of other concurrent commitments and operation of the facility. This schedule is subject to revision should the results of the above discussed assessment so warrant.

QA Audit Program (Item III.2.B of the Plan)

Each of the elements of the Plan (the Management Systems) is being included in the upgraded Quality Assurance Program to assure conformance of procedures and continued adherence to changes which result from the audit commitments. Implementation of each specific change to the Quality Assurance Program is contingent upon implementation of the related management system and will be made within three months of the implementation of the related management system.

We trust that this information is responsive to your requests. We suggest that these items be added to the agenda for our upcoming meeting and we will be prepared to discuss each item at that time. In the interim, should you have any additional questions or need for other information, please do not hesitate to contact us.

Very truly yours,

W D Harrington