

BOSTON EDISON COMPANY  
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WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

March 18, 1982

BECO. Ltr. No. 82-86

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

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

Dear Sir:

By letter dated January 18, 1982, the Commission by the Director of Inspection and Enforcement, issued an Order Modifying License Effective Immediately (the Order). This Order required that Boston Edison Company (BECO) submit to the Administrator of Region I of the Nuclear Regulatory Commission (NRC) for review and approval, a comprehensive plan of action (the Plan) that "will yield an independent appraisal of site and corporate management organizations and functions, recommendations for improvements in management controls and oversight, and a review of previous safety-related activities to evaluate compliance with NRC requirements." On February 16, 1982, at BECO's request, the time for submission of the Plan was extended to March 19, 1982.

The attached Boston Edison Performance Improvement Program submitted in response to the Order details an 18 to 24 month program that will result in demonstrated effective regulatory performance and continued safe and reliable operation of the Pilgrim facility. The program includes an independent appraisal of site and corporate organizations and functions, modifications in organizational structure, improvements to be made in management control and oversight systems, and programs designed to improve individual performance.

The independent appraisal is likely to provide information relevant to both the scope and schedule of the Performance Improvement Program, and is likely to modify the long term tasks and milestones identified in the attached plan. BECO will provide the Administrator of Region I of the NRC all program revisions and a description of implementation staff requirements, documentation requirements, and specific schedule milestones in July 1982.

We believe the program is comprehensive and focused on effective management for continued safe plant operation. The following are considered to be key tasks. Specific reference to each aspect of the Order is provided.

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BECO intends to better control the scheduling and implementation of future modification work performed within the plant. This will be accomplished by limiting the total number of craft personnel as well as the number of areas being worked. Complete engineering and procurement will be accomplished prior to the start of work to minimize construction durations. Engineering and analysis efforts will be similarly maintained at safe, effective, manageable levels. Work scoping, planning and authorization will be implemented with improved rigor and work activities more effectively controlled. Emphasis will be placed on the quality of work and the ability to achieve committed completion dates. This control program was discussed with Region I personnel on February 16, 1982 and with NRR at our meeting on February 19, 1982 and may require schedule relief from NRC in meeting certain in service dates, for future modification. This strategy is an essential supporting element of the Performance Improvement Plan.

Obviously a key milestone in the process is the approval of the Comprehensive Plan. BECO believes the Plan is responsive to the NRC request; however, we are prepared to discuss and resolve any questions which may arise. We also consider the Plan to be sufficiently comprehensive to encompass the problems identified in your Inspection Report dated February 4, 1982. Once the Plan is approved, BECO will continue to update the NRC through periodic meetings at a frequency to be specified by Region I.

Very truly yours,

*W D Hamington*

WDH/mg

Enclosures

cc: Mr. Richard C. DeYoung, Director

BECO COMPREHENSIVE ACTION PLAN  
FOR PERFORMANCE IMPROVEMENTS

<u>Task</u>	<u>Reference Paragraph in Section V to Order Modifying License</u>
<b>I. <u>INDEPENDENT REVIEW AND EVALUATION</u></b>	
1. Management Analysis Company Assessment	1
2. Organizational Peer Group Review of Independent Evaluation	1
<b>II. <u>ORGANIZATION</u></b>	
1. Corporate On-Site Review	6
2. Safety Organization Review	3, 6, 7
<b>III. <u>MANAGEMENT SUPPORT SYSTEMS</u></b>	
1. Commitment Management Systems	2
a. Commitment Control	
b. Regulatory Change and Compliance	
c. Corrective Action	
d. Correspondence Review	
2. Safety Management Systems	3, 6, 7
a. Safety Review and Assessment	
b. QA Audit Program	
3. Configuration Management Systems	4
a. Modification Management	
b. Plant Procedure and Drawing Evaluation	
c. Testing Program	
d. Preventative Maintenance System	
<b>IV. <u>INDIVIDUAL PERFORMANCE</u></b>	
1. Improved Training Program	5