

Enclosure

License No. DPR-35
Docket No. 50-293
Licensee: Boston Edison Company
Facility: Pilgrim Nuclear Power Station
Subject: Progress Report on Implementation of Boston Edison Company
Performance Improvement Program

Summary of Meeting with Boston Edison Company on August 24, 1982.

On August 24, 1982, the Senior Vice President-Nuclear and members of his staff met with the NRC Region I staff (attendees listed in Appendix A to this Summary) at King of Prussia, Pennsylvania to discuss the status of Boston Edison Company's (BECO's) Performance Improvement Program (PIP) that is to be implemented as a result of the NRC Order issued to BECo on January 18, 1982. In a July 29, 1982 letter to the NRC the licensee submitted the integrated plan, PIP Revision 1, which incorporates the results of the Management Analysis Company's (MAC) appraisal and the NRC comments to date.

The licensee opened the meeting with a discussion of the August, 1982 milestones. Two corrections were pointed out to the PIP Rev. 1: The August, 1982 milestone for Design Change Control, III.3.B, should be September, 1982; and the August, 1982 milestone for Plans/Policies for career paths, IV.2, should be August, 1983. The remaining August, 1982 milestone, item III.2.B, Plant Operating Experience Task Force, was complete.

The licensee briefly summarized the content of PIP Rev. 1, and provided the NRC staff with a matrix summarizing the milestones and cross-referencing them to the MAC action items where appropriate.

The NRC staff indicated that a written response to the licensee's July 29, 1982 submittal was expected to be issued within the next few weeks and informed the licensee of some areas that needed clarification, further explanation, or corrections. Specific items discussed included the following: evaluation of past modifications to determine adequacy of procedure/drawing changes and training, the scope of licensee's planned self audit of PIP Rev. I implementation, the licensee's system of feedback of operating experience information, "To Be Determined" and "In Progress" milestone due dates, the extent of safety related system walkdowns completed and planned.

The licensee also described the actions taken in response to PIP item III.2.A, review of past modifications for any unreviewed safety questions. The licensee reviewed approximately 1500 design changes and 30,000 maintenance items. A review of each design change narrative for design details was made. A review of each safety evaluation was made for completeness and approval signatures. The content of each change was reviewed by a committee of experienced personnel and compared to the FSAR including Section 14, Safety Analysis. Approximately 180 questions surfaced and were resolved. The NRC staff indicated that this process appeared to be an acceptable method to complete PIP item III.2.A.

The NRC staff cautioned the licensee that approval of the PIP milestones for preventive maintenance actions did not constitute overriding any other superceding regulatory requirements (e.g. IEB 79-01B) or previous licensee commitments (e.g. high drywell temperature effects). The licensee stated that this was understood and had been taken into account.

The licensee briefly reconfirmed plans for a reorganization to take effect on September 1, 1982 and discussed several changes at both the station and corporate levels. The licensee stated that an Licensee Event Report and proposed Technical Specification changes would be issued to the NRC in September, 1982.

The meeting closed with a decision to hold the next discussion of the Performance Improvement Program implementation on October 5, 1982, in the NRC Region I Office.

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J. R. Johnson, Senior Resident
Inspector

APPENDIX A

Attendants of the NRC - Boston Edison Company meeting on August 24, 1982 at the
NRC Region I Office

Boston Edison Company

W. D. Harrington, Senior Vice President - Nuclear
J. E. Howard, Vice President - Nuclear
W. H. Deacon, Nuclear Operations Support Department
J. W. Ashkar, Nuclear Engineering Department
R. D. Machon, Nuclear Operations Manager

NRC Region I Office

R. C. Haynes, Administrator
R. W. Starostecki, Director, Division of Project and Resident Programs
J. R. Johnson, Senior Resident Inspector
L. Briggs, Reactor Inspector

Office of Nuclear Reactor Regulations

K. Eccleston, Licensing Project Manager, Division of Licensing, NRR,
Operating Reactors Branch 2