SEP 2 7 1982

Docket No. 50-293

Boston Edison Company M/C Nuclear ATTN: Mr. William D. Harrington Senior Vice President, Nuclear 800 Boylston Street Boston, Massachusetts U2199

Gentlemen:

Subject: Performance Improvement Program (PIP)

We have reviewed your July 29, 1982 response (PIP, Revision 1) to the NRC Order Modifying L.cense Effective Immediately (the Order) which was issued to Boston Edison Company (BECo) on January 18, 1982.

During a Management Meeting held in the NRC Region I Office on August 24, 1982, members of my staff discussed with you and your staff certain areas of the PIP (Revision 1) which require clarification or correction. In particular, in order to more adequately address elements four and five of the Order we understand that you are presently taking action to evaluate the effectiveness and accuracy of training and procedure/drawing changes which resulted from past modifications. It was also discussed that you will evaluate your system of training on those procedure changes not specifically resulting from modifications. These and other areas of the PIP which require clarification or correction as agreed at the August 24th meeting are enclosed as an attachment to this letter.

We find the PIP (Revision 1) to be acceptable based on our understanding that you will incorporate the comments described in the attachment to this letter into the next revision to the Performance Improvement Program. At the present time, we believe that you and your staff should continue to meet with me and my staff at the Region I office periodically to discuss the status and effectiveness of the Program implementation. I anticipate that the planned meeting dates can be established at the conclusion of each meeting held.

Sincerely,

Original Signed By:

Ronald C. Haynes Regional Administrator

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Boston Edison Company M/C Nuclear

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cc w/attachment: A. V. Morisi, Manager, Nuclear Operations Support C. J. Mathis, Station Manager Public Document Room (PDR) Local Public Document Room (LPDR) Nuclear Safety Information Center (NSIC) NRC Resident Inspector Commonwealth of Massachusetts (2) J. Shotwell, Assistant Attorney General J. Bonsall, Chairman, Department of Public Utilities Senator Edward P. Kirby Chairman, Board of Selectmen

bcc w/attachment: S. Burns, ELD J. Lieberman, IE R. Starostecki E. Brunner T. Elsasser L. Briggs Region I Docket Room (w/concurrences)

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OFFICE	RI:DPRP	Brunner	Starostecki	Allan Y	Haynes	
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ATTACHMENT

BECo Performance Improvement Program, Rev. 1 Areas

Needing Clarification or Corrections

- 1. Several "to be determined" milestone dates need to be specified.
- Two August 1982 milestone dates (III.3.B, IV.2) are in error and are to be changed to September 1982, and August 1983.
- 3. A cross reference should be attached showing which milestones are responsive to each specific element of the Order.
- 4. An additional milestone(s) needs to be added to describe actions already in progress to satisfy the last parts of paragraphs (4) and (5) of the Order the process of evaluating past modifications to determine the effectiveness of training and the accuracy of procedure/drawing changes. Since this process includes a sampling of fire protection modifications and those performed in the 1980 outage, an additional milestone needs to be added to determine whether the scope of this process should be expanded.
- 5. An existing milestone needs to be clarified or a new one added to satisfy paragraph (5) of the Order - to evaluate the present system for training personnel on procedure changes which are not the result of modifications.
- Item III.3.D should be reviewed, and clarified if necessary, to determine the extent of system walkdowns completed to date and those portions remaining to be done.
- 7. Item IV.2 needs to be corrected regarding annual appraisals for all personnel.
- A completion milestone date needs to be added for the "in progress" task item II.6 - establish description/procedures for a new Quality Engineering group.
- 9. Several final milestones in different areas that begin with the words "Final completion of ..." need to be clarified to indicate that this is not additional improvement actions but a type of summary review and verification report of that specific area.