

BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
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Ralph G. Bird
Senior Vice President — Nuclear

November 5, 1990
BECo Ltr. 90-131

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

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

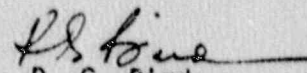
**SUBJECT: Response to Systematic Assessment of Licensee
Performance Board Report No. 50-293/89-99**

Dear Sir:

Attached is Boston Edison Company's response to the Systematic Assessment of Licensee Performance (SALP) Board Report for Pilgrim Nuclear Power Station (PNPS) covering the period July 1, 1989 through August 15, 1990.

In general, the report provides an assessment of Pilgrim that is consistent with our internal assessments. An exception to your assessment of Emergency Preparedness is included in the attachment.

Please do not hesitate to contact me if there are any questions or comments regarding the attached response.


R. G. Bird

RLC/bal

Attachment 1: Response to Systematic Assessment of Licensee Performance Board
Report No. 50-293/89-99

cc: Mr. Thomas T. Martin
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ATTACHMENT 1

Boston Edison Company
Pilgrim Nuclear Power Station

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RESPONSE TO SYSTEMATIC ASSESSMENT OF LICENSEE
PERFORMANCE BOARD REPORT NO. 50-293/89-99

I. EMERGENCY PREPAREDNESS

In response to SALP Board Recommendation III.D.3 and with respect to Emergency Preparedness, we concur with the overall assessment and believe that the report accurately reflects the current excellent state of the Station's Onsite Preparedness Program.

In addition, with the continued cooperation of Commonwealth of Massachusetts and local officials, we are committed to the long-term maintenance of offsite preparedness for emergencies at Pilgrim Station. The company has dedicated significant resources in terms of management oversight, staff support, and financial support to assure success in this area.

However, we take exception to one area of the report that states: "...It is not clear that sufficient action has been taken to resolve incomplete and longstanding offsite issues."

Boston Edison was recently requested (NRC letter dated September 14, 1990), to provide a review of offsite issues as outlined in the transcript to the NRC's Public Meeting held in Plymouth, Massachusetts on September 6, 1990.

The result of our review was documented in a report that has been forwarded to the NRC's Document Control Desk (via Boston Edison letter dated October 4, 1990).

The conclusions reached in our report state: "We believe that a careful review of the items discussed in this report (including those identified as requiring corrective action) will demonstrate that a comprehensive and effective offsite response program has been established." The conclusion goes on to state: "In short, the information contained in this report demonstrates that there is reasonable assurance that public health and safety will be adequately protected in the event of an emergency at Pilgrim Station."

As Boston Edison has demonstrated, the Company is dedicated to ensuring an adequate, implementable offsite program is in place for Pilgrim Station. Boston Edison believes such a program currently exists. Regarding the SALP Report's specific comments, the company is working with Commonwealth and local officials to incorporate "lessons learned" from the October 1989 Exercise, as well as making other improvements and refinements. The shortcomings in the Commonwealth and local programs that FEMA identified in its August 1987 self-initiated review have been addressed.

Boston Edison is confident that the current joint NRC/FEMA Task Force investigating the offsite program will confirm the Company's conclusions.

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II. PLANT OPERATIONS

Paragraph 2 of the Analysis Section III.A.1 states: "... A total of thirteen safety system actuations were experienced this period." Boston Edison recommends this sentence be reworded to say a total of fourteen Engineered safety feature actuations were experienced this period. The proposed change is in keeping with the NRC definition of safety system actuations and Engineered safety feature actuations.

III. RADIOLOGICAL CONTROLS

Paragraph 4 (page 9) of the Analysis Section III.B.1 states: "...However, the frequency of surveillance in the radwaste area needed to be increased as none were conducted during the first three months of 1990." The following summarizes the Quality Assurance Department activities in the Radwaste functional area in the first three months of 1990:

- QA Audit 90-04, "Radwaste Shipping" was performed from February 13, through February 27, 1990.
- QA Surveillance 90-2.3-3, "Radwaste/Water Quality" was performed on March 14 and March 18, 1990 and the report was issued on 3/29/90 (just after an NRC Region 1 inspection had ended). No deficiencies were identified.
- 18 Radwaste shipments were witnessed by QC (full time inspector assigned to Radwaste shipments).

Additionally, a QAD self assessment of QC oversight of Radwaste was performed for the 4th quarter 1989 (QAD 90-026 issued January 8, 1990). Apparently, this information was not properly communicated to the NRC during the SALP period. We request that this information be considered in the final SALP report.

IV. MAINTENANCE/SURVEILLANCE

In response to SALP Board recommendation III.C.3 and to improve the effectiveness of failure mechanism and causal analysis determinations, the following enhancements were implemented:

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- The concept of Multi-Disciplined Analysis Team (MDAT) has been adopted to fully investigate failures of the type experienced after the feedwater event and manual scram in September 1990. MDATs have been staffed with experts, technical and managerial, and have proved their effectiveness in determining root causes and providing technically correct and effective recommendations for corrective action.
- The root cause analysis instruction has been revised to incorporate the guidance of INPO Good Practice OE-907 and to strengthen the requirements validating the effectiveness of each cause and corrective measures determination.

V. CONCLUSION

We will continue to raise the standards of the Nuclear Organization. Our self-assessment practices have made a major contribution to this result and will contribute to further improvement. Our commitment to improve has the support of the highest levels of the company and extends throughout the Nuclear Organization.