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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

August 27, 1982

BECo Ltr. #82-229

Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
Region 1
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

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

- References: (a) USNRC Letter dated July 7, 1982;
Inspection No. 50-293/82-12
(b) BECo Letter dated August 6, 1982;
Response to Inspection No. 50-293/82-12

Subject: Supplemental Response to I&E Inspection No. 50-293/82-12

Dear Sir:

This letter is written to clarify the information we provided to you in Ref. (b). The need for this clarification was recognized and agreed to by members of our staff during a meeting on August 16, 1982 with the Senior Resident Inspector assigned to Pilgrim Station.

A training session was initiated for all licensed personnel to inform them of the deviation in reactor water level instruments event and to review the appropriate directions as delineated in Special Order 82-04. This training has been completed.

In order to prevent future violations of this nature, we have written a draft training plan which incorporates the specifics of the reactor water level divergence event. This training will be included in the Plant Systems Update portion of the Operator Requalification Program which will be completed by November 1, 1982.

The event which led to this notice of violation concerned a failure to recognize and follow a limiting condition of operation which was entered while attempting to resolve the deviation between the reactor water level instruments. This event and others of a similar nature, has caused us to take corrective actions which address the broader issue of adequately recognizing, interpreting and applying Technical Specifications.

We have implemented interim administrative controls which require Watch Engineer (WE) and Shift Technical Advisor (STA) concurrence on Technical Specification interpretations which allow continued operation of the unit. These controls provide escalation to higher management for those areas of disagreement.

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We believe this step will resolve our concerns until completion of the following actions.

We have held discussions with consultants for the development of a Tech Spec training program for the STA's. This program is expected to be ready for implementation by October 15, 1982.

The Tech Spec training provided for the WE's and the other SRO's during their requalification training will subsequently be expanded to encompass the training afforded the STA's. This training will be completed by the end of each individual's next requalification cycle. (September 1, 1983)

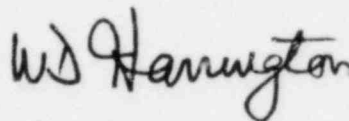
The Operator Requalification Training Program will also be reviewed and revised as necessary to assure that the operations personnel receive adequate training concerning reactor water level anomalies and instrument channel logic, which includes ECCS, RPS and PCIS System logic. This program assessment will be completed by January 1, 1983 and the resultant training provided during the next requalification cycle. (September 1, 1983)

We are also filling the position of Chief Operating Engineer to provide continuity of direction to the operations group. We expect to have this completed by October 1, 1982.

We trust that you will find this clarification satisfactory; however, should additional information be required, please contact us.

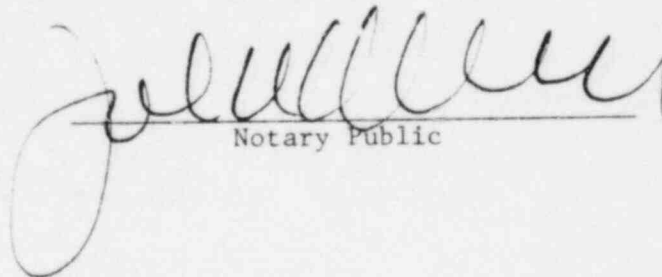
Very truly yours,

Commonwealth of Massachusetts)
County of Suffolk)



Then personally appeared before me William D. Harrington, who, being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company, the applicant herein, and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My Commission expires: December 27, 1985


Notary Public