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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

August 6, 1982

BECO Ltr. #82-206

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

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

Reference (A): NRC letter of July 7, 1982 from
Mr. R. W. Starostecki to Mr. W. D. Harrington
(BECO. Ltr. #1.82.192)

Subject: IE Inspection 82-12

Dear Sir:

This responds to a violation identified in a routine safety inspection conducted April 5-May 9, 1982 at the Pilgrim Nuclear Power Station and transmitted to us in Reference (A).

The response to the specific notice of violation (INC 82-12-01) is contained in the attachment to this letter.

A substantial review of this event was performed, which included corporate involvement. Although the elements of a corrective action plan had been initiated, we have now determined that the investigation into the most probable cause was not satisfactorily concluded prior to implementation, nor did it consider whether a causal relationship exists between this and other events, which would indicate a broader issue. Therefore, we will continue to investigate this issue and develop a corrective action plan accordingly.

As part of our corrective action, we will include additional Operator training to ensure their familiarity with multiple Technical Specification situations which may apply during certain operational circumstances and additional training to ensure operator familiarity with reactor protection system logic.

Mr. Richard W. Starostecki, Director
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We believe this response satisfactorily addresses the item identified in Reference (A). Should you require further information concerning this response, please contact us.

Very truly yours,

WD Harrington

Commonwealth of Massachusetts)
County of Suffolk)

Then personally appeared before me William D. Harrington, who, being duly sworn, did state that he is Sr. 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: *October 21, 1988*

Peter M. Keller

Notary Public

attachment

ATTACHMENT

Violation, Appendix A (Inc 82-12-C1)

Technical Specification 3.1.1 requires complete insertion of all control rods within four hours when both trip systems have less than two operable reactor low water level instrument channels.

Contrary to the above, on March 29, 1982, complete insertion of all control rods was not performed within four hours of having less than two operable reactor low water level instrument channels in both trip systems.

This is a Severity Level IV violation (Supplement I).

Response

Our immediate corrective action was to issue Special Order 82-04, "Directions following Deviation Between Reactor Water Level Instruments," and to conduct training for all on-watch personnel regarding this issue. This training is scheduled for completion by September 1, 1982.

To preclude recurrence, the subject reactor water level divergence issue will be incorporated into the Operator Requalification Program, which is scheduled to begin on September 7, 1982, at which time, full compliance shall be achieved.