

BOSTON EDISON COMPANY
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

October 25, 1982

BECo. Ltr. #82-276

Proposed Change #82-12

Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

Proposed Administrative Technical Specification Change

- References: (1) BECo Ltr. #81-126, J. E. Howard (BECo)
to T. A. Ippolito (NRC), dated 6/8/81
- (2) NRC Ltr., R. W. Starostecki (NRC) to
W. D. Harrington (BECo), dated 7/15/82
(1.82.215)

Dear Sir:

Pursuant to Section 50.90 of the Commission's Rules and Regulations, Boston Edison Company hereby proposes the following modifications to Appendix A of Operating License No. DPR-35.

Proposed Change

Boston Edison Company was directed by the Nuclear Regulatory Commission by letter dated January 18, 1982 to have an independent evaluation of current organizational responsibilities, management controls, staffing levels and competence, training and retraining programs, communications, and operating practices as they relate to nuclear activities both at Pilgrim Station and the corporate office. Management Analysis Company (MAC) was employed by BECo to perform this function.

As a result, BECo has identified certain specific needs of its Nuclear Organization and has recently implemented several key changes to improve and enhance its performance. Changes to Section 6.0, Administrative Controls of the PNPS Technical Specifications, are therefore required to reflect new positions and titles as described below and shown in the accompanying attachments.

Also, in Reference (1) we proposed an Administrative Technical Specification change which among other changes included a request for the deletion of the Chief Operating Engineer position. Your office has not yet granted this request pending additional information and justification from BECo. In Reference (2) Mr. Harrington, Senior Vice President - Nuclear, outlined organizational changes that will occur at

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Pilgrim Nuclear Power Station including the retention of the Chief Operating Engineer position. Therefore, Boston Edison withdraws the above referenced Technical Specification change request in its entirety. The other changes included in Ref. (1) will be re-submitted in this application.

New positions titled; Sr. Vice President - Nuclear, Vice President - Nuclear Operations, Vice President - Nuclear Engineering and Quality Assurance, Director of Operations Review, On-site Safety & Performance Group Leader, Pilgrim Station Manager, Training Manager, and Station Services Group Leader have been created. Throughout Section 6.0 of the Technical Specifications, the lines of reporting have been re-structured at all levels to accommodate this major reorganization effort as follows:

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All nuclear activities at Boston Edison have been reassigned to an organizational unit headed by a Senior Vice President who has no other function or line responsibilities. Prior to this restructuring, the responsible Senior Vice President had responsibility for two other line organizations.

Reporting to the Senior Vice President are two Vice President positions; Vice President - Nuclear Operations, and Vice President - Nuclear Engineering and Quality Assurance. The Quality Assurance Department and the Nuclear Engineering Department report to the V.P.- Nuclear Engineering and Quality Assurance, and the Nuclear Operations Department (NOD), Nuclear Operations Support Department (NOSD), and Training Department report to the V.P. Nuclear Operations. Additionally, the Management Services Group (located onsite) now reports to the NOSD (offsite).

A new position of Director - Nuclear Operations Review (DNOR) has been established having responsibility for corporate management oversight of on-site safety related activities. The DNOR reports directly to the Senior Vice President - Nuclear. The position of On-site Safety & Performance Group Leader, has been structured and included as a member of the ORC. The On-site Safety & Performance Group reports to the DNOR. Reporting to the Safety & Performance Group Leader are the Shift Technical Advisors.

A position of Training Manager has been established reporting directly to the V.P. Nuclear Operations.

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The positions of Nuclear Operations Manager and Deputy Managers have been eliminated and the position of Station Manager has been re-instituted.

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The Pilgrim Station Security Supervisor has been provided with new lines of reportability. The Security Supervisor will report administratively to the Nuclear Operations Support Manager and functionally to the Station Manager for day to day operations.

page 210a

This page has been eliminated from the Technical Specification (see Reason for Change section). The Fire Prevention & Protection Officer will report administratively to the Nuclear Operations Support Manager and functionally to the Station Manager for day to day operations.

Reason for Change

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The establishment of a Senior Vice President solely responsible for nuclear activities provides full authority and management support to effect constructive change, obtains access to BECo's highest management level, and improves responsiveness to the needs of the Nuclear Organization.

Dividing functional responsibilities between two vice presidents establishes an organization structure which allows communication of perceived or potential problems to a level of authority that can specifically identify with those needs and provide the necessary support or ensure that satisfactory corrective action is taken when appropriate. The Quality Assurance Department is thus maintained independent of the on-site operating organization and the Nuclear Engineering Department provides for additional services beyond those provided by the operating organization professional-technical personnel.

The DNOR position has been established to provide onsite corporate safety awareness of day-to-day plant operations.

The On-Site Safety and Performance Group Leader is accountable for the development and implementation of the Shift Technical Advisor Program. The formal structuring of the Safety & Performance function and the inclusion of its Group Leader as a member of the ORC will also emphasize the Organization's commitment to the systematic review of plant performance and operational safety, and provide an added dimension for feedback of operations experience to the ORC for improving plant safety.

The Management Services Group Leader is responsible for assuring that the assigned facilities, people, time, material, and money are effectively utilized to accomplish the station administration and management service activities with emphasis on the Boston Edison Quality Assurance Manual requirements. Reporting to an off-site manager allows the Management Services Group to be once removed from the daily operational activities and influences.

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The Training Department is presently expanding its scope of programs and systems for both licensed and non-licensed personnel and developing programs which will fulfill the needs of Nuclear Organization personnel performing safety-related activities. The training group, which had primarily existed to provide licensed operator training and retraining, has recently been expanded into a department, a Manager of Training hired, and a significant increase in the staffing level authorized.

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The corporate re-structure depicted on page 209, specifically the V.P. - Operations, effectively eliminates the need for the Nuclear Operations Manager as the focal point of responsibility for the varying station operational modes and resultant needs. As such, the re-institution of the Station Manager was required to assume the overall responsibility for plant operation, maintenance and technical service activities. In turn, the Deputy Manager positions were eliminated, as these positions would have provided an unnecessary layer of reporting/communications between the Station Manager and his Chiefs/Group Leaders.

page 210a (Removed)

Having the Fire Prevention and Protection Officer report administratively to the Nuclear Operations Support Manager eliminates a burdensome administrative load from the Station Manager while affording programmatic issues a level of attention which can best be accomplished through an offsite line of communications.

NOTE: The same lines of communication as established for the Fire Prevention and Protection Officer have been established for the Security Supervisor. This affords the same lines of reportability for the reasons stated above.

Safety Considerations

The management reorganization as structured, clearly establishes the roles, responsibilities, and reporting lines of the Nuclear Organization. The qualifications for individuals serving in the described positions have not changed, resulting in no loss of authority or decrease in responsibilities for the safe operation of the plant.

The proposed changes are in conformance with the provisions of ANSI N18.7 - 1972. changes have been reviewed by the Nuclear Safety Review and Audit Committee and have been reviewed and approved by the Operations Review Committee.

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Schedule for Change

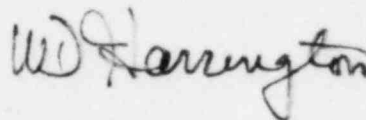
Boston Edison Company proposes that these changes be effective and fully implemented upon receipt to the NRC.

Fee Determination

Boston Edison Company proposes that pursuant to 10 CFR 170 this is a Class II Amendment and requests that the fees submitted in association with our withdrawn Reference (a) application be applied accordingly.

Should you have any questions or concerns regarding this matter please do not hesitate to contact us.

Very truly yours,



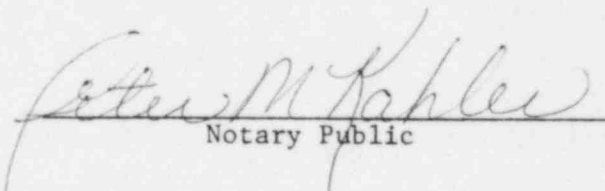
Attachments

3 signed originals and 37 copies

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: *October 21, 1988*


Notary Public