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SENIOR VICE PRESIDENT
NUCLEAR

October 26, 1982
BECO Letter No. 82-278

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

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

Subject: Response to Inspection Report 82-22

Reference: (a) Letter from R.W. Starostecki (NRC) to W.D. Harrington (BECO)
dated September 28, 1982 (BECO Letter No. 1.82.292)

Dear Sir:

This responds to the three items of violation contained in the referenced letter. These items of violation were identified by Mr. J. Johnson of the NRC during a routine safety inspection conducted August 2, 1982 to September 6, 1982 at the Pilgrim Nuclear Power Station.

Item of Violation A (50-293/82-22-02)

Technical Specification (T.S.) 6.9.B.1.b requires prompt notification by telephone within 24 hours and written confirmation no later than the first working day following the operation of the unit when any parameter or operation is less conservative than the least conservative aspect of the limiting condition for operation (LCO) established in the T.S.

Contrary to the above, prompt notification and written confirmation was not made within 24 hours and the first working day, respectively, for the two events listed below in which the unit was operated in a manner which was less conservative than the least conservative aspect of the LCO:

- 1) On August 1, 1982, the speeds of both recirculation pumps were not maintained within 15% of each other with power less than 80% (T.S. LCO 3.6.F), and
- 2) On June 3, 1982, neither a differential pressure decay rate test was initiated immediately nor was the reactor placed in cold shutdown within 24 hours following the failure of one of the two position alarm systems for a drywell-suppression chamber vacuum breaker (T.S. LCO 3.7.A.4.d, 3.7.A.6).

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Response to Item A

- 1) The recirculation pump speed mismatch which occurred on August 1, 1982 was reported to the NRC by telephone and telecopy on August 3, 1982. On August 13, 1982, licensee event report (LER) 82-22 was issued to provide details of the event. These actions completed the notifications to the NRC that were required by Technical Specification (TS) 6.9.B.1.6 for this event.

The failure to provide prompt notification of this event to the NRC was attributed to the improper adherence of station personnel to the Technical Specifications. A contributing cause was the failure of station procedures to properly recognize the limiting condition for operation (LCO) created by T.S. 3.6.F.

Improper adherence of station personnel to the Technical Specifications is recurring and the corrective actions that are planned are based on our supplemental response to Inspection Report 82-12. This supplemental response was provided in the letter from W.D. Harrington (BECO) to R.W. Starostecki (NRC), dated August 27, 1982 (BECO Letter No. 2.82.229). The corrective actions planned involve the development of a technical specification training program to instruct affected personnel on the contents of the PNPS Technical Specifications and the importance of strict adherence to these specifications. Personnel who shall receive this technical specification training include the shift technical advisors (STAs), members of the operations review committee (ORC), station compliance engineers, and any additional personnel as specified by the vice president-operations. Selected operations personnel shall receive similar technical specification training in a revision to the operator requalification training program. As an immediate corrective action, the chief operating engineer has issued written instructions to all affected personnel to increase awareness of the importance of the PNPS Technical Specifications and the reporting requirements in 10 CFR 50.72.

To correct the contributing problem with deficient procedures, several procedure revisions are planned. A change to T.S. 3.6.F shall be requested to include an action statement for recirculation pump speed mismatch. Both the operating instructions for the reactor recirculation system (PNPS Procedure 2.2.84) and the daily surveillance log (PNPS Procedure 2.1.15) shall also be revised to state the actions which must be taken for this event.

The procedure revisions and the technical specification change request shall be completed by January 14, 1983. The technical specification training program described above shall begin for the STAs on November 17, 1982; however, because the training of operations personnel will be completed during the operator requalification training program, the technical specification training will not be completed until September 1, 1983. At that time, full compliance will be achieved.

- 2) As stated in the inspection report, the failure to satisfy the requirements of TS 3.7.A.4.d was incorrectly reported to the NRC as a 30-day report in accordance with TS 6.9.B.2.c for a missed surveillance test (see LER 82-17, issued July 1, 1982).

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The failure to provide prompt notification of this event to the NRC was attributed to the improper adherence of station personnel to the Technical Specifications. Corrective actions for this recurring event are described in the response to Part 1, above. As stated above, full compliance will be achieved by September 1, 1983.

Item of Violation B (50-293/82-22-03)

10 CFR 50.72 requires notification by telephone, to the NRC Operations Center, within one hour of any event resulting in manual or automatic actuation of the Reactor Protection System.

Contrary to the above, on September 1, 1982, the NRC Operations Center was not notified within one hour of an automatic initiation of the Reactor Protection System (main condenser low vacuum trip).

Response to Item B

As stated in the inspection report, the NRC Operations Center was notified of the event at 8:00 am on September 1, 1982. This notification was five hours late and is considered to be an isolated occurrence. The operations personnel who were on watch at the time received immediate verbal counselling on the importance of immediate notification of the NRC of actuation of the reactor protection system. In addition, the chief operating engineer issued a written instruction to affected personnel, which included the importance of adherence to the reporting requirements of 10 CFR 50.72. This written instruction is further described in Part 1 to the response to Item of Violation A (50-293/82-22-02).

To preclude recurrence of this event, the scram report description provided in PNPS Procedure 1.3.9 shall be revised to explicitly state the notification requirement in 10 CFR 50.72. This revision shall be completed to result in full compliance by December 10, 1982.

Item of Violation C (50-293/82-22-04)

Technical Specification 3.7.A requires either the immediate performance of a differential pressure decay rate test or the initiation of a shutdown if a failure of one of the two installed position alarm systems occurs for one or more drywell-suppression chamber vacuum breakers.

Contrary to the above, on June 3, 1982, one of the two installed position alarm systems for drywell-suppression chamber vacuum breaker A0-5045G was failed and a differential pressure decay rate test was not performed immediately nor was an orderly shutdown initiated.

Response to Item C

On June 7, 1982, the failure to satisfy the requirements of TS 3.7.A.4.d was recognized and the drywell-to-torus vacuum breaker leak rate test (PNPS Procedure 8.A.2) was performed satisfactorily. The drywell-to-torus vacuum breaker operability test (PNPS Procedure 8.A.1) was performed on June 8, 1982 to confirm the operability status of the redundant position alarm system. The leak rate

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test was repeated every 15 days until the position alarm system on vacuum breaker A0-5045G was made operable. These actions satisfied the requirements of TS 3.7.A.4.d for the inoperable position alarm system.

The failure to perform the actions required by the LCO in TS 3.7.A.4.d was attributed to the improper adherence of station personnel to the Technical Specifications. A contributing cause is the failure of station procedures to properly reflect the requirements of the Technical Specifications. To improve the adherence of station personnel to the Technical Specifications, the chief operating engineer has issued a written instruction. Training on the Technical Specifications is planned for affected station personnel. These actions are further described in Part 1 of the response to Item of Violation A (50-293/82-02-02). In addition, the drywell-to-torus vacuum breaker operability test procedure (PNPS Procedure 8.A.1) has been revised to include the corrective actions required by TS 3.7.A.4.d for an inoperable position alarm system. A change to TS 3.7.A.4 will be requested to clarify the wording.

The technical specification change request shall be issued by January 14, 1983. Because part of the training described above will be completed during the operator requalification training program, full compliance will be achieved by September 1, 1983.

On August 27, 1982 we submitted a supplemental response to I&E Inspection Report No. 50-293/82-12 (BECO Letter No. 82-229). While preparing that response, we were aware that INC 82-12-01 was not an isolated event in that it was similar in nature to the three events which are the subject of this Inspection Report. The corrective action plan developed in response to INC 82-12-01 reflected these generic implications and addressed the broader issue of adequately recognizing, interpreting, and applying Technical Specifications.

We are confident that our broadly scoped corrective action plan in conjunction with the specific responses to each notice of violation will resolve this concern.

Please do not hesitate to contact us if further information or clarification is deemed necessary.

Very truly yours,

Commonwealth of Massachusetts)
County of Suffolk)

W.D. Harrington

Then personally appeared before me W.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*

Peter M. Kahler
Notary Public