

NOV 16 1982

Docket No. 50-293

Boston Edison Company M/C Nuclear  
ATTN: Mr. William D. Harrington  
Senior Vice President, Nuclear  
800 Boylston Street  
Boston, Massachusetts 02199

Gentlemen:

Subject: Systematic Assessment of Licensee Performance (SALP)

This letter and its enclosures document NRC's assessment of the performance of licensed activities at the Pilgrim Nuclear Power Station for the period September 1, 1981, to June 30, 1982. The enclosed SALP Report, dated August 12, 1982, includes performance assessments for each of the nine functional areas which were evaluated. These individual assessments were discussed with you and your staff by Mr. R. W. Starostecki of this office on September 1, 1982, at the Boston Edison Company offices in Braintree, MA.

Our overall assessment of the performance of NRC licensed activities at the Pilgrim facility is that improvement has occurred since the organizational and personnel changes which took place earlier this year. There now appears to be a satisfactory level of management attention and involvement in plant safety matters. This has enhanced the plant's performance with respect to operational safety. We recognize that efforts are underway to improve the management systems and utilization of resources at the Pilgrim facility. These changes and plans are documented in the Performance Improvement Plan which were submitted to the NRC on July 30, 1982. However, we also realize that it will be several months before some of these improvements will be completed. Although performance has improved recently, some shortcomings have been noted and we have included them in this report. In particular, we believe additional attention is warranted on your part in the areas of day-to-day plant operations and fire protection/prevention activities. We will be increasing our attention to these areas to ascertain if identified weaknesses are being corrected.

In the meeting of September 1, 1982, the NRC staff benefited from your comments concerning the SALP Program and the functional area performance assessments. I have also reviewed your letter of September 20, 1982 and have included responses to your comments in this package. The SALP Board also considered your concerns and I had the benefit of their input. The results of these considerations are presented below.

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### Plant Operations

We have reviewed your exception to our example regarding the damaged main turbine bearing. Since this is an activity not routinely inspected by NRC staff, the circumstances surrounding the restart of the turbine were not fully appreciated. Accordingly, the SALP report has been supplemented to withdraw this example and is included in the attached SALP report.

You also commented that our example of untimely engineering analysis is considered inappropriate. The basis for your comments was stated to be actions undertaken toward the latter part of our SALP period. Problems existed with regard to the timeliness of engineering analysis before initiation of the integrated work program in March 1982. We acknowledge that improvement has apparently been made in this area; however, the comment is considered appropriate because this weakness was demonstrated during a large portion of the evaluation period. Our assessments consider the overall period of performance.

### Surveillance

The event related to the unauthorized tightening of a piece of equipment during containment leak rate testing is characterized in the SALP report as related to ineffective communications between worker and immediate supervisor.

The board's comment and analysis of this event was intended to address the need for better management and supervision of complex activities. The PCILRT is an important test that provides valuable component leak rate data. As you have noted, steps were taken to minimize the opportunity for error. However, an action was taken that could have been avoided if there was more attention paid to assuring that key individuals were made aware of the scope and purpose of their activities.

### Refueling

The SALP board has also considered your evaluation that the Refueling area be more appropriately rated as Category I. The positive aspects of your performance are addressed in the SALP report and were previously taken into account. However, the evaluation of this functional area goes beyond only refueling operations; it includes other aspects associated with an outage, such as modifications and resolution of problems. When the entire refueling outage is viewed from this broader perspective, it was concluded that Category 2 is the appropriate ranking.

In accordance with 10 CFR 2.790(a), a copy of this letter and its enclosures will be placed in the NRC Public Document Room. No reply to this letter is required. Your actions in response to the NRC Systematic Assessment of Licensee Performance will be reviewed during future inspections of your licensed activities.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Ronald C. Haynes  
Regional Administrator

Enclosures:

1. SALP Management Meeting - Attendees
2. NRC Region I SALP, Pilgrim Nuclear Power Station, August 12, 1982
3. Region I letter, R. W. Starostecki to W. Harrington dated August 19, 1982
4. BECO Response letter, W. Harrington to R. W. Starostecki, September 20, 1982

cc w/encls:

- A. V. Morisi, Manager, Nuclear Operations Support
- C. J. Mathis, Station Manager
- Joanne Shotwell, Assistant Attorney General
- Jon N. Bonsall, Chairman, Department of Public Utilities
- Plymouth Board of Selectmen
- Plymouth Civil Defense Director
- Senator Edward P. Kirby
- Public Document Room (PDR)
- Local Public Document Room (LPDR)
- Nuclear Safety Information Center (NSIC)
- NRC Resident Inspector
- Commonwealth of Massachusetts (2)

bcc w/encls:

- Region I Docket Room (with concurrences)
- Senior Operations Officer (w/o encls)

RI: DPRP  
Elsasser/cgl  
11/15/82

RI: DPRP  
Greenman

RI: DPRP  
Starostecki

RI: DPRP  
MARTIN

RA: Haynes  
11/15

Enclosure 1

U. S. NUCLEAR REGULATORY COMMISSION

SALP Management Meeting Attendees

Licensee: Boston Edison Company  
800 Boylston Street  
Boston, Massachusetts 02199

Facility Name: Pilgrim Nuclear Power Station

Meeting at: Braintree, Massachusetts

Meeting conducted: September 1, 1982

1. Boston Edison Company Attendees

W. Harrington, Senior Vice President - Nuclear  
J. Ballentine, Vice President, Nuclear Operations  
J. Howard, Vice President, Nuclear Engineering and Quality Assurance  
H. Brannan, Quality Assurance Manager  
R. Butler, Nuclear Engineering Department Manager  
A. Morisi, Nuclear Operations Support Department Manager  
D. Sanford, Training Manager  
R. Machon, Director of Outage Management  
L. Oxsen, Director of Nuclear Operations Review  
R. Cunningham, Special Assistant to the Vice President

2. NRC Attendees

R. W. Starostecki, Director, Division of Project and Resident  
Programs, Region I  
T. C. Elsasser, Section Chief, Reactor Projects IB  
J. Johnson, Resident Inspector  
K. Eccleston, Licensing Project Manager, NRR