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September 20, 1982

BECO. Ltr. #82-249

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

Response to Systematic Assessment of
Licensee Performance (SALP)

Dear Sir:

On September 1, 1982 a meeting was held at Boston Edison's Corporate Offices in Braintree, Massachusetts, to discuss your assessment of our performance from the period of September 1, 1981 through July, 1982.

Attachment I outlines our responses and comments to that report.

We believe substantial progress has been made during the last six months and expect the trend to continue as a result of further actions.

Increased visibility of managers and supervisors at all levels regarding plant operations is being stressed. These efforts will increase our level of observation, correction and training of personnel regarding plant maintenance and operation. Additionally, supervisors will be relieved of as much routine administrative activities as possible to permit personal presence out in the plant.

An increased professional attitude towards job requirements and responsibilities will be stressed to all operating and maintenance personnel. This includes adequate communication, shift turnover, and adherence to established procedures and policies. On-the-scene monitoring by local management and corporate personnel will ensure this happens. Exceptions, if found will be reported to the corporate level.

The basic cause of many operational concerns mandates more aggressiveness in analyzing operational and equipment malfunctions. Therefore, we will establish an increased awareness of operating experience which emphasizes event root cause identification and evaluation.

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Additionally, our increased training programs for personnel will provide an acceptable mechanism to improve our ability to meet present and future needs of our organization and NRC concerns.

We trust this response is adequate; should you have any questions do not hesitate to contact us.

Very truly yours,

WJ Harrington

ATTACHMENT I

1. Performance Analysis of Plant Operations

BECo Actions

An action plan has been developed and is being implemented to evaluate the existing Operating Experience Assessment function for routine review of operating data from Pilgrim Station as well as other industry data sources. This evaluation will identify and make improvements to insure that lessons learned from past experiences receive timely review and corrective action. A task force was established to review the existing operating experience program against INPO "good practice" guidelines and to submit recommendations for improving the BECo Operating Experience Assessment Program. This action will be followed by a decision on the Task Force recommendations for improvements to the system.

Boston Edison Company is also committed to improving the system for identifying, reviewing and evaluating NRC identified violations and licensee commitments so as to determine the potential impact upon the organization and thus assure appropriate actions are developed, implemented and documented. Part of this commitment will consist of clarifying the organizational roles and accountabilities for NSRAC and ORC review activities.

The development and implementation of an improved Commitment Control System is part of our concerted effort toward timely resolution of regulatory issues. The system will provide the organization with commitments status through reports issued on a predetermined and as requested basis. Issues which exhibit potential for delay will be highlighted through Exception Reports and personal followup.

To better strengthen our monitoring of routine operational activities, we have committed to implementing a special training program for the Shift Technical Advisors (STA's) and Watch Engineers (WE's) which will enhance their ability to adequately recognize, interpret and apply Technical Specifications.

Further, we have filled the position of Chief Operating Engineer to provide continuity of direction to the operating group.

BECo Comments

We take exception to the example provided regarding the damaged main turbine bearing. We evaluated and questioned the contractors actions to verify the adequacy of the work performed and our visual checks showed oil flow to the bearing. Without the benefit of hindsight we believe we used accepted operating practice to restart the turbine.

Also, the example of untimely engineering analysis is considered inappropriate at this time. The Nuclear Engineering Department (NED) has instituted since March of 1982 an integrated work program which assigns priorities and resources in cooperation with the Nuclear Operations Department (NOD) to achieve timely responses to identified needs.

2. Radiological Controls

BECo Actions

Boston Edison is cognizant of the need to implement an aggressive and extensive program of reducing sources of radiation throughout the plant. We will actively investigate the development of a program to achieve this goal.

Comments

Radiological Control is an important consideration at Pilgrim Station. Corporate management and all levels of the Nuclear Organization are committed to keep all exposures As Low As Reasonably Achievable.

Additionally, Boston Edison has implemented a Respiratory Protection Program which has significantly improved our capability to provide ALARA considerations for worker exposure.

3. Maintenance of Plant

BECo Response

One of BECo's primary objectives is to improve the quality of the Pilgrim Station Maintenance Program. Accordingly, the routine maintenance activities at the Station will be conducted in such a manner that the "quality" of maintenance activities will support configuration control. Boston Edison has begun implementing a plan, as part of the recently developed Refueling Outage Management function, which requires standards for maintenance tasks including consideration for crew size, tools and material required, planning work sequencing and estimated hour duration. The experience gained during the refueling outage will be used to revise and expand this effort.

A greater sense of professionalism toward job requirements and responsibilities will be cultivated among the operations and maintenance personnel. This will be accomplished through the continuation of our endeavors for overall performance improvement such that: communications between the operators, maintenance personnel and supervisors become more businesslike in manner; shift turnovers become more complete and informative; managers, operators, and maintenance personnel alike, become more cognizant of what conditions or abnormalities (root cause) should be immediately acted upon or reported for followup actions. Additionally, supervisory personnel at all levels will become more involved in the details of plant operation and will be relieved of burdensome administrative activities. Plant tours, inspections to determine actual material conditions and observations of operators and technicians at work with resultant coaching, correcting and training will become a "way of life" at Pilgrim.

4. Surveillance

BECo Response

The corrective actions previously identified for strengthening the scheduling and tracking system through computerization are the actions BECo believes will ultimately resolve the missed surveillance problems. We have experienced additional difficulties while introducing this system but we are addressing modifications to the system and its implementation process (such as an early warning mechanism which will prevent lost rescheduling time when a surveillance is not performed on its assigned day

Comment

Boston Edison management personnel instructed all pertinent personnel in the reactor building about the significance of tightening down equipment during PCILRT testing. Unfortunately, the individual described in the above statement perceived a hazardous situation existed. Accordingly, his remedy was to tighten the leaking equipment. Adequate supervision had been provided. The area of work in which the individual was located, precluded direct supervision due to ALARA considerations. Boston Edison takes exception to the NRC's characterization of cause of this event.

5. Fire Protection and Housekeeping

BECo Actions

BECo recognizes the importance of expeditious implementation of corrective actions developed in response to internal Quality Assurance Audits in the area of Fire Protection. To achieve this goal we have included these action plans in the QA deficiency report tracking system which has been developed in conjunction with our internal commitment control process. This computerized system was developed by the Nuclear Planning, Scheduling and Cost Control Group in conjunction with QAD. Deficiency Status Reports are generated monthly and forwarded to the Senior Vice President, Vice Presidents, and Department Managers for appropriate actions.

Action plans are being developed for audit deficiencies which remain open, to ensure timely corrective actions are completed. These plans will be monitored by the Commitment Control System.

The increased management attention and support which has been directed towards fire prevention and housekeeping standards since March of 1982 remains a priority effort. The recent organization changes reflect this determination as evidenced by the restructuring of the fire prevention personnel reporting format and the recently created Station Services Group.

Our General Employee Training (GET) program is being supplemented by providing fire protection information and a handout and by adding specific questions to the associated quiz relating to fire protection requirements. Technical Specifications and procedural requirements for fire barriers and instrumentation will be given additional emphasis during the upcoming Operator requalification program scheduled for 11/1/82 through 9/1/83. Plant orientation/familiarization for infrequently entered areas will be included in the fire brigade initial training and requalification programs.

The replacement of the disabled carbon dioxide system for the cable spreading room and two vital switchgear rooms is proceeding on an expedited schedule and will be inservice by January 15, 1983.

6. Emergency Preparedness

Comment

Boston Edison continues to firmly commit dedicated aggressive management attention and support in all aspects of Emergency Planning.

7. Security and Safeguards

BECo Action

Procedures are in place for storage and control of safeguards information. These procedures have been revised recently to greatly broaden their level of detail. They presently are in draft format awaiting ORC review and approval. Increased coordination between security staff and operations staff is being stressed. Additionally, we believe the actions outlined in our response to IE Inspection Report 82-02 and 82-03 (Safeguards Information) alleviate the concerns regarding the manning of vital area portals during computer outages.

Comments

Boston Edison Company believes that the procedures currently in place which implement the Security Plan for PNPS are adequate to assure continued control. These procedures are reviewed for adequacy on an annual basis.

8. Refueling:

BECo Comments

We believe the appropriate ranking of this area should be Category I. The basis for this position is provided by the following:

- 1) No items of noncompliance have been identified associated with refueling activities.
- 2) The significant improvement/development of start-up management for tracking the elements of new plant modifications.
- 3) The addition of internal staffing, and SRO's for fuel movement.
- 4) Training programs held prior to refueling activities for all personnel involved.
- 5) NRC concerns in the area of fire protection/housekeeping have already been addressed under the category of Fire Protection
- 6) NRC concerns in the area of Management inattentiveness have already been addressed under the category Plant Operations.

9. Licensing Activities

BECo Response:

We are evaluating our Staffing levels through our current re-organization efforts. Adequate Staffing for regulatory requirement implementation are among the areas receiving special attention. Our goal is to achieve an adequate level of staffing such that quality responses are provided on time.

Also, to ensure continuity in the project management function, we have defined the project management concept most suitable to our organizational needs and transferred functional responsibility to the Nuclear Engineering Department for implementation.