

BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

April 8, 1982

BECO. Ltr. #82-99

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19405

Docket Number 50-293
License No. DPR-35

- Reference (A) NRC Letter dated July 22, 1980,
IE Inspection 80-05
- (B) Boston Edison Letter to NRC dated
August 13, 1981
- (C) NRC Letter dated March 9, 1982,
IE Inspection 50-293/81-21

Subject: Inspection 50-293/81-21

Dear Sir:

This responds to items of violation contained in Reference (C), the result of a routine safety inspection conducted August 31 - September 4, 1981 and September 28 - October 2, 1981. Our responses are contained in the attachment to this letter.

In your cover letter to Inspection 81-21 (Reference (C)), you state that Item A of Appendix A was identified in a previous inspection (Inspection 80-05, Reference (A)), and is therefore a recurring item demonstrating inadequacies in the corrective actions described in Reference (B).

We do not believe that Item A in 81-21 is recurring, but rather an isolated event. Unlike the items in 80-05, the main access point to the drywell access area was posted and barricaded, control was constantly maintained by both security and health physics personnel, and personnel were briefed concerning existing high radiation levels prior to being allowed access.

Based on these differences we believe that this Item A has been inappropriately classified as a recurring item.

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We believe the responses contained in this response satisfactorily address your concerns. Should you require any further information concerning this response, please contact us.

Very truly yours,

William D Harrington

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*

Peter M. Kapler
Notary Public



Appendix A, Item A

Technical Specification 6.13 requires that each area in which the intensity of radiation is greater than 100 mrem/hr be conspicuously posted as a High Radiation Area.

Contrary to the above, on September 28, 1981, the reactor drywell exhibited general area radiation intensities ranging from 100-300 mrem/hr and neither the area nor the main access point to the area were posted as a High Radiation Area.

Response to Item A (INC 81-21-07)

The drywell equipment hatch entry area posting did not identify the area as a High Radiation Area. This occurrence is related to a missing posting insert "High Radiation Area" which had not been included in the posting changes required by the opening of the drywell equipment hatch and the commensurate change of personnel entry from the normal personnel airlock entry to the drywell equipment hatch. Technical Specification 6.13 states "In lieu of the control device or alarm signal required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit"

We emphasize that the area was barricaded and the entrance was positively controlled by security and health physics personnel. The area was conspicuously posted but the posting did not contain the wording "High Radiation Area". The error of not having the signs indicate "High Radiation Area" was immediately corrected. It is deemed that the intent of the regulations was not compromised in that entry to the area was positively controlled and that personnel were briefed as to high radiation levels prior to being allowed access. No further action is planned as full compliance was immediately achieved.

Appendix A, Item B

Technical Specification 6.11 requires that procedures for radiation protection be adhered to for all operations involving radiation exposure. Procedure No. 6.1-022, Radiation Work Permit (RWP), Revision 7, Section V.A., requires that individuals working under the control of an RWP follow all instructions on the RWP. RWP No. 81-963, Overhaul Tools for Outage, dated July 17, 1981, requires cloth hoods to be worn while working. Section G of this same procedure requires that all personnel entering or leaving a work area under the control of an RWP sign in on the access control sheet indicating name, time in and out, and pocket dosimeter reading in and out.

Contrary to the above:

1. On September 2, 1981 three out of four individuals working on the Refueling Floor under RWP No. 81-963 with material contaminated to 10,000 dpm/100 cm² (beta/gamma) did not wear cloth hoods.
2. On June 1 and 2, 1981 an individual entered the access to the drywell personnel airlock, an area controlled by RWP No. 81E-1, and did not sign in or out on the access control sheet.

Response to B (INC 81-21-13 and 81-21-08)

The persons not wearing cloth hoods, thereby being in violation of procedures, were directed to immediately don the proper protective clothing. These persons were subsequently reprimanded for their failure to follow procedures. Full compliance was achieved September 4, 1981.

As stated in our letter of August 13, 1981 (Ref. A), the person who failed to follow procedures concerning signing in and out of the drywell personnel airlock (under RWP 81E-1) was reprimanded. To preclude recurrence, a policy directive on procedural compliance was issued to reinforce the necessity of following procedures and to warn of disciplinary actions to be taken for procedural violations. Full compliance was achieved by August 13, 1981.

Appendix A, Item C

10 CFR 19.11 requires the posting of copies of any Notice of Violation involving radiological working conditions and any response from the licensee within two working days of receipt of the notice and within two working days of dispatch of the response.

Contrary to the above, a Notice of Violation dated June 8, 1981 involving radiological working conditions, and the response from the licensee dated July 29, 1981, had not been posted as of August 31, 1981.

Response to C (INC 81-21-02)

The immediate corrective action was to procure and post the June 8, 1981 notice of violation and our response to it.

To prevent recurrence, a memo has been issued to cognizant personnel reinforcing the posting requirement. It also directs that any documents necessary to satisfy 10 CFR 19.11 be sent directly to the person(s) responsible for posting. Full compliance has been achieved.

In further response to Item A (INC81-21-07) and Items B (INC81-21-13 and 81-21-08), we are discussing with the NRR to avoid high work activity levels in the plant in an effort to meet narrow schedule deadlines. We believe levelizing the number of personnel on site and working to realistic schedules will assist us in our efforts to better control personnel in the future.