

Certified By

C. Holahan

27 JAN 1983

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: Combined Inspections 82-02/82-03

This refers to your letter dated May 19, 1982, in response to our letter dated April 29, 1982.

Thank you for informing us of the corrective and preventive actions documented in your letter concerning Appendix A, Items A and C and Appendix B. These actions will be examined during a future inspection of your licensed program.

Concerning your response to Appendix A, Item B, of our Notice of Violation, you requested that this violation be withdrawn and presented your reasons for each of the three examples under Item B. We have evaluated your request and note the following about each of the examples:

- (1) The first example states that Maintenance Request (MR) 81-12-52, Replacement of Reactor Water Cleanup System Piping was, in part, performed without an approved procedure, and your response states that the only element of this task not covered by an approved procedure was placement of the piping in accordance with an isometric, which you indicated was within the skills normally possessed by a mechanic and therefore permitted by ANSI N18.7-1972.

We do not concur for the following reasons:

- a. Office memorandum M-81-350 describes the replacement of a section of Reactor Water Cleanup System piping; starts with the phrase "This replacement procedure..."; and, continues by specifying the sequencing of work, the actual work to be performed, when and how QC was to be involved, and the piping fit up, welding and post-work test procedures to be utilized. While the individually referenced generic procedures had been approved, their selection for this job had not been. While individual tasks specified in M-81-350 may have been within the skills of the mechanics, the sequencing of work, QC involvement, material specifications and other information contained in M-81-350 were important to the correct performance of this job.

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- b. As noted in the details of the inspection report, there is an existing Pilgrim Station procedure 3.M.1-11, "Routine Maintenance" which specifies the type of work which may be done without a procedure. Replacement of major pieces of reactor plant piping which we view this situation to be, is not included in this procedure.
- c. Technical Specification 6.8.1 and 6.8.2 requires that procedures under the scope of ANSI N18.7-1972, paragraph 5.1 be reviewed by the ORC and approved by the ORC Chairman. Maintenance procedures fall within the scope of ANSI N18.7-1972, paragraph 5.1. Office memorandum M-81-350 was issued and used as a maintenance procedure, but was not reviewed by the ORC and approved by the ORC Chairman.

Based on the above, our finding still remains that this example falls within the scope of the requirements of ANSI N18.7-1972 and Technical Specification 6.8, and constitutes a violation.

- (2) Concerning the second example which stated that MR 81-23-35 authorized the repair, adjustment and test of the HPCI Turbine Stop Valve Balance Chamber by use of an unapproved procedure, your response stated that a violation had not yet occurred and was prevented as a result of the inspection.

We do not concur for the following reasons:

- a. MR 81-23-35 authorized the use of G.E. SIL 352. This maintenance had been authorized on October 13, 1981 and was still in progress at the time of the inspection on January 1982. SIL 352 prescribes procedures for the repair, adjustment, and test of the HPCI Turbine Stop Valve Balance Chamber. Based on discussions with your staff, adjustments of the HPCI Turbine Stop Valve Chamber per the SIL had been performed and the MR remained open pending completion of testing.
- b. Technical Specification 6.8.1 and 6.8.2 and ANSI N18.7-1972 require that maintenance and test procedures be reviewed by the ORC and approved by the ORC Chairman - SIL 352 had no such review and approval.
- c. Although the actual testing had not yet started at the time of our inspection, we determined, and your staff confirmed, that approval per the Technical Specifications of SIL 352 or issuance of a separate approved procedure had not been planned.

Based on the above, which notes that SIL 352 was authorized (See 2.a above) and partially performed, although, the test portion had not yet been performed, our finding still remains that this example is within the scope of Technical Specification 6.8 and constitutes a violation.

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- (3) Concerning the third example which stated that MR 80-1589 authorized maintenance and test of the HPCI stop valve hydraulic cylinder, without an approved procedure, your response states that this maintenance was performed with an existing PNPS procedure. We note that MR 80-1589 does not reference a PNPS procedure nor was a procedure provided to us during the inspection. Based on your response, this example is considered unresolved (50-293/82-02-07) and will be reviewed during a future NRC:Region I Inspection.

Please inform us in writing within twenty (20) days of your corrective actions to prevent recurrence of events similar to those discussed above.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

T. T. MARTIN

Thomas T. Martin, Director
Division of Engineering and
Technical Programs

cc:

Edward R. MacCormack, Nuclear Security Staff Assistant
A. V. Morisi, Manager, Nuclear Operations Support
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Region I Docket Room (with concurrences)
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