

BOSTON EDISON COMPANY  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

May 16, 1983  
BECo Letter No. 83-110

Mr. James Allen  
Acting Regional Administrator  
Office of Inspection and Enforcement  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

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

Supplementary Information  
Clarifying Prior Boston Edison  
Correspondence to NRC

Dear Sir:

The purpose of this letter is to provide you with supplemental (clarifying) information with respect to prior I&E Bulletins correspondence exchanged between Boston Edison Company and your office.

The need to provide supplemental information was identified as a result of implementing a regulatory commitment to sample prior I&E Bulletin correspondence for completeness and accuracy.

The I&E Bulletin review commitment is contained in BECO's Performance Improvement Plan (PIP) which responded to the Order Modifying License dated January 18, 1982.

The I&E Bulletin review plan consisted of the following steps:

1. Identification of all I&E Bulletins (January 1975 to Present) applicable to PNPS;
2. Selection of a sample of the applicable Bulletins for detailed review;
3. Establish the exact NRC requirements of each Bulletin selected;
4. Identify and compile all BECO/NRC correspondence on the selected Bulletins;
5. Identify and compile all BECO internal documentation regarding the selected Bulletins;
6. Review the documents compiled in (4), (5) to determine:
  - a. Adequacy and completeness of the response to the Bulletin.

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- b. Consistency of information in BECo's internal documentation with that in the response to the NRC; and
  - c. Completion of any commitments made in the response to the NRC.
7. Evaluate need to expand the sample size.

#### Results Achieved

All steps of the action plan were completed. Deviations were identified for two of the 11 Bulletins reviewed as follows:

#### I&E Bulletin 80-01

1. In the response to I&E Bulletin 80-01, (BECo Letter #80-11), BECo stated that the ADS pneumatic supply lines from the outside containment isolation valve to the ADS valve operator are Class I, seismically qualified. This statement needs to be clarified in that only the portions of the supply lines across the containment boundary and from the check valve (serving each accumulator) to the valve operators are seismic Class I. This does not present a safety concern, however, as the design basis for the ADS system does not require the supply line upstream of the ADS accumulator check valves to be seismic Class I (FSAR Section 4.4 and 7.4).

We believe this oversight was due primarily to the rapid turnaround required for the response (the Bulletin was received by Boston Edison on January 14, 1980 and required a written response by January 18, 1980).

2. Also in response to Bulletin 80-01, BECo stated that "actions have been initiated to obtain soft seat check valves and install them prior to the completion of the 1980 refueling outage." These valves were actually installed during the 1981 outage under our design change # PDCR 81-51.
3. In the Bulletin 80-01 response, BECo also committed that "a leak rate test program is being developed and will be implemented prior to the end of the Refueling Outage." A satisfactory leak rate test was conducted on the SRV accumulators utilizing hard seat check valves prior to startup from the 1980 refueling outage using Procedure 8.7.1.10; Rev. 0.

Procedure 8.7.1.10; Rev. 2 was issued on December 9, 1981 to reflect a new testing program after the installation of the new soft seat check valves. This program (test procedure) will be performed once per Refueling Outage.

The above deviations 2. & 3. posed no safety concerns, in that an alternative measure was taken to assure SRV operability requirements were met.

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I&E Bulletin 79-19

In the review of I&E Bulletin 79-19, it was found that a commitment to the NRC was not met. In this response, BECo committed to develop and institute a training program for personnel involved in the transfer, packaging and transport of radioactive materials by October 1, 1980. This missed commitment was the subject of a Notice of Deviation issued by the NRC as a result of I&E Inspection 82-06 on February 10-12, 1982. Accordingly, tracking of this commitment will be followed in BECo's response to Inspection 82-06.

Boston Edison believes that the I&E Bulletin sample selected for review was adequate to demonstrate the completeness and accuracy of BECo's evaluation process. This is based on the review findings that in each case BECo properly identified the Bulletin requirements and adequately addressed each item in the response. As to accuracy, one minor inaccuracy was identified where the response to the NRC did not agree with internal documentation (Bulletin 80-01). This error was primarily due to the brief review time allowed by the Bulletin, and presented no consequence to safety. The review of the two Bulletin responses discussed above did however identify instances where, although we met our commitments, our actions were not timely. Based on these findings, an expanded sampling of I&E Bulletin review is being implemented. The scope of additional I&E Bulletin review will focus on commitments made as a result of BECo - NRC I&E Bulletin responses and will be dispositioned through follow-up action under the Performance Improvement Plan (PIP) periodic status meetings.

We trust the supplementary information presented herein is adequate to meet your needs.

Very truly yours,

*W.D. Harrington*

Commonwealth of Massachusetts)  
County of Suffolk )

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



cc: Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Reg.  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555