

BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

July 14 , 1983

BECO Ltr. #83-183

Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
U. S. Nuclear Regulatory Commission
Region 1
531 Park Avenue
King of Prussia, PA 19406

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

Subject: Inspection 83-13

Reference: NRC Letter to Boston Edison, dated June 8, 1983

Dear Sir:

This letter responds to the two violations identified during a routine chemical and radiochemical measurements program inspection conducted between May 10, 1983 and May 13, 1983 and communicated to Boston Edison Company in Appendix A of the reference.

Notice of Violation A (INC 83-13-^c)

Section 6.8.A of the Technical Specifications requires that written procedures shall be established, implemented, and maintained that meet or exceed the requirements of ANSI N18.7-1972 and Appendix A of Regulatory Guide 1.33. ANSI N18.7-1972 and Appendix A of Regulatory Guide 1.33 require chemical and radiochemical control procedures including validity of calibration techniques and adequacy of analyses. Procedure 7.10.4 Shelf Life of Chemicals, written pursuant to the requirements of Section 6.8.A of the Technical Specifications, requires a shelf life of no more than one week for the mixed indicator solution used in the chloride analysis specified by Procedure 7.1.40, Chloride Low Concentration.

Contrary to the above, on May 10, 1982 the mixed indicator solution was dated April 22, 1982, indicating a shelf life of greater than one week.

Response

The immediate corrective action was to dispose of the outdated solution and to prepare a fresh batch for use. This action occurred on May 11, 1983.

To preclude recurrence, the Chemistry Technicians were counseled in procedural adherence, in particular the requirements of Procedure 7.10.4, Shelf Life of Chemicals. This action was completed on May 19, 1983.

Full compliance was achieved on May 19, 1983.

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Notice of Violation B (INC 83-13-02)

Section 6.8.A of the Technical Specifications requires that written procedures shall be established, implemented, and maintained that meet or exceed the requirements of ANSI N18.7-1972 and Appendix A of Regulatory Guide 1.33.

Section 6.8.B of the Technical Specifications requires that the procedures of Section 6.8.A shall be reviewed by the ORC and approved by the Station Manager prior to implementation. ANSI N18.7-1972 and Appendix A of Regulatory Guide 1.33 include procedures used for effluent sample analysis.

Contrary to the above, the procedures used by a vendor laboratory for strontium and tritium analyses of effluent sample were not reviewed and approved as required.

Response

The Boston Edison Company (BECO) maintains that the Supplier services for strontium and tritium analysis of effluent samples were procured in accordance with applicable NRC regulations as evidenced below.

Regulatory Guide 1.123 describes a method acceptable to the NRC Staff for complying with the Commission's regulation with regard to quality assurance requirements for control of procurement of items and services during the design, construction and operations phases of nuclear power plants. The guide states the regulatory position regarding ANSI N45.2.13-1976 in that the requirements included in said Standard are acceptable and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10CFR Part 50 subject to certain conditions including one which mandates the guideline (Section 4.2.a) used in evaluating a Suppliers history of providing a satisfactory product (service).

Section 4.2 of N45.2.13 describes selection methods to be utilized in the evaluation of a Supplier and one acceptable method (endorsed by the NRC) is the evaluation of the Suppliers history of providing a satisfactory product (service).

A recent technical re-evaluation has confirmed that the subject supplier is and continues to be technically qualified to supply the quality service specified in the Purchase Order and therefore, BECO is confident that it satisfies the requirements specified in the Regulatory Guide 1.123 and ANSI N45.2.13. Furthermore the routine NRC inspections performed by the Environmental and Special Projects Section, "independently" confirm the acceptability of the Vendor service and is documented in inspection reports.

The BECO methodology used to procure the subject quality service from the Supplier laboratory is appropriate and consistent with the requirements established by the BECO Quality Assurance (QA) Program and the service continues to be supplied under a valid (until December 31, 1983) Quality Category "Q" Purchase Order. An integral part of the evaluation for initial "Q" approval and the maintenance of "Q" status is contingent upon acceptable

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findings of QA audits and annual re-evaluations which verify adequacy of the suppliers QA program and that the purchased services are being conducted in accordance with the suppliers QA Manual and appropriate implementing procedures.

The Pilgrim Station Technical Specification Section 6.8 requirement to have written procedures and administrative policies reviewed by the Operations Review Committee (ORC) and approved by the ORC Chairman applies only to those safety related activities occurring at the facility (as described in Section 2 of the Facility Operating License), it is not applicable to procured services where associated activities do not occur at the facility.

It is contended therefore as evidenced above that Boston Edison Company is in compliance with the Technical Specifications. Accordingly, you are hereby requested to withdraw the alleged violation (INC 83-13-02).

Please direct any comments or questions regarding these responses to the undersigned.

Very truly yours,

WD 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: May 2, 1986

Barbara M. Donahue
Notary Public