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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

July 6, 1983

BECO Ltr. #83-171

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

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

Subject: Inspection 83-09

Reference: NRC Letter to Boston Edison, dated June 6, 1983

Dear Sir:

This letter responds to three violations and one deviation identified during a special safety inspection conducted between April 4, 1983 and May 3, 1983, and communicated to Boston Edison Company in the Appendices A and B of the above referenced letter.

Notice of Violation A (INC 83-09-03)

10CFR50, Appendix B, Criterion II, Quality Assurance Program, requires that structures, systems, and components to be covered by the Quality Assurance Program be identified. The Boston Edison Company Operations Quality Assurance Manual, Section 1.2.B, dated January 31, 1983, states that the Nuclear Engineering Department is responsible to maintain the Q-List and supporting documents which identify the safety related structures, systems, and components to which the Quality Assurance Program applies. Field Revision Notice 79-25-48, dated July 14, 1981, of Plant Design Change Request No. 79-25, Anticipated Transient Without Scram (ATWS) - Recirculation Pump Trip (RPT)/Alternate Rod Insertion (ARI) System, stipulates in Section 7.1, General System Characteristics, that the ATWS-RPT/ARI is safety related (Q).

Contrary to the above, as of May 3, 1983, the Nuclear Engineering Department did not maintain the Q-List as required in that none of the safety related components of the ATWS-RPT/ARI system were included on the Q-List.

RESPONSE

The ARI and RPT systems as whole systems are not safety related. However, portions of the RPT system are considered safety related where the system interfaces with other safety related systems. In accordance with the procedure existing at this time for maintaining the Q-List (NED 6.07), the safety

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related portions of RPT will have been identified in the Q-List only after official completion of PDCR 79-25 (i.e. all engineering drawings reflect as-built condition). The fact that the Q-List was not updated reflects a problem with the plant design change process which was previously recognized and addressed by BECo under the Performance Improvement Program (PIP).

Corrective actions taken to correct the deficient condition are as follows:

- (1) Safety related portions of RPT are now identified in Q-List Section III (completed June 83).
- (2) Those devices determined to be non-safety related, but to which 10CFR50 Appendix B work controls will be applied are now identified in a new Q-List Section IV entitled Management Quality Control Items (completed June 83).

Corrective actions planned to preclude recurrence of the deficient condition are as follows:

- (1) A mechanism is now being incorporated into NED 6.07, NED 3.02 (PDC Procedure) and NED 3.03 (FRN) for identifying and tracking the installation of safety related equipment throughout the design change process. This action is to be completed by July 31, 1983.
- (2) Under the PIP all outstanding PDC's are being "closed out" on a programmatic basis. This action is to be completed by October 31, 1984.

Based upon the planned revision of the aforementioned NED Procedures, the expected date for full compliance is July 31, 1983.

Notice of Violation B (INC 83-09-01)

10CFR50, Appendix B, Criterion VII, Control of Purchased Material, Equipment, and Services, requires that measures be established to assure that purchased material conforms to the procurement documents.

Boston Edison Company Purchase Order (P.O.) No. 62102, dated May 3, 1979, procured equipment from General Electric Company (GE) for an ATWS Recirculation Pump Trip System and P.O. 62102 specified requirements for submittal of documents (pertaining to items purchased by GE) and required that the components be identified with Boston Edison Q Item Numbers.

Contrary to the above, on March 15, 1980, safety related equipment procured under P.O. 62102 was accepted for use during receipt inspection but did not meet the documentation and identification requirements of the Purchase Order (No. 62102).

RESPONSE

The corrective action taken to correct the deficient condition was to initiate

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a sub-order modifying the original Purchase Order (No. 62102). The sub-order requests that the documentation and identification requirements be deleted in the revised Purchase Order. The subject revision is expected to be issued to G.E. by July 31, 1983.

Boston Edison receipt inspection procedures require the material received to conform to the procurement document requirements or be placed in a state of "Q.C. Hold". The procurement document is understood to be the original document (e.g. Purchase Order, contract, memorandum, etc.) along with any subsequent approved modifiers that have been brought through the same approval process as the original procurement document. In this case, however, (1) a GE letter, G-HK-9-107, dated August 9, 1979 which delineated several negotiated exceptions to P.O. 62102 (including the additional Documentation and Identification requirements) and (2) a BECo letter, NED 79-68, dated September 14, 1979 (which acknowledged acceptance of the GE Purchase Order exceptions) were presented to the Quality Assurance Department as part of the procurement package. The Quality Assurance Department upon review of P.O. 62102 and the formal modifying correspondence referenced above, accepted the material received as being in conformance with the "procurement document".

Corrective action to preclude recurrence of this condition is that the NED and the NOD implementing procedures for procurement of items and/or services will be reviewed and revised to address situations in which the specifications of the original procurement documents are changed by requiring that those changes be brought through the same approval process as the original documents. Based upon the issuance of revised procedures NED 4.01 and PNPS 3.M.1-5 the expected date of full compliance is 9/30/83.

Notice of Violation C (INC 83-09-04)

10CFR50.71(e) requires that an Updated Final Safety Analysis Report (FSAR) be submitted to the NRC by July, 1982 and that this submittal shall bring the FSAR up to date as of a maximum of 6 months prior to the date of filing the update.

Contrary to the above, as of May 3, 1983, the licensee's updated FSAR submittals had not brought the FSAR up to date in that the description of the Anticipated Transient Without Scram, Recirculation Pump Trip and Alternate Rod Insertion System (installed and made operable as required by Facility Technical Specification in May, 1980) was not adequately included.

RESPONSE

It is BECo's opinion that the level of detail provided in the FSAR for RPT and ARI is consistent with the rest of the FSAR, in compliance with the requirements of 10CFR50.71(e), and therefore does not warrant a violation per 10CFR2, Appendix C. However, due to management decisions, additional descriptions are being developed in Chapters 1, 4, 7, 8, 14, and Appendix G. These changes are intended to be incorporated in the July, 1983 FSAR update.

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- (1) The ARI and RPT systems are not classified as "Safety Related" systems. A great deal of time and effort has been spent throughout the Industry addressing this question and the classification of these systems as non-safety related has prevailed.
- (2) The subject violation states "The level of detail to be maintained in the updated FSAR should be at least the same as originally provided." Since these systems are not safety related BECo feels the level of detail was consistent with that classification in the original FSAR.
- (3) Anticipated Transient Without Scram (ATWS) is not a design basis event and has yet to be addressed by a final rule. The ARI and RPT modifications were installed in good faith as interim fixes until the proper evaluation and rule-making on ATWS were completed. Again, given this information, BECo feels the level of detail is consistent with the importance presently afforded to ATWS.

Based on the above information, Boston Edison contends that Violation C (83-09-04) does not represent a violation and requests that you withdraw the item.

Notice of Deviation (83-09-09)

As a result of the inspection conducted on April 4 - May 3, 1983, and in accordance with the NRC Enforcement Policy (10CFR2, Appendix C) published in the Federal Register on March 9, 1982 (47CFR9987), the following deviation was identified:

Pilgrim Nuclear Power Station FSAR Section 8.4.7 and Table 8.0.4, Inspection and Testing, states that mechanical inspection of 480V load centers will be performed approximately every two years.

Further, in response to IE Bulletin No. 79-09, Boston Edison Company letter (No. 79-101), dated May 23, 1979 to NRC Region 1, stated that implementation of preventive maintenance procedure No. 3.M.3-6, Inspection and Overhaul of 480V Load Center Breakers, would be performed each refueling cycle for safety related circuit breakers.

Contrary to the above, the licensee failed to implement procedure 3.M.3-6 during the last refueling cycle that ended in March, 1982, in that preventive maintenance was not performed on 480V load center safety related breakers as required.

RESPONSE

BECo feels that FSAR Table 8.4.3 (the Updated FSAR replacement for Table 8.0.4 mentioned in the deviation) intentionally provides approximate frequencies for inspection. This guideline is based on industrial standards and BECo experience with the subject components throughout its entire power distribution system.

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The Salem incident of 1983 triggered a detailed review of the 480V breaker maintenance practices at PNPS. The need to expand our Mechanical Testing and Lubrication Procedures was identified. As part of our corrective action to be taken, we are presently working with the manufacturer to identify the optimum lubricant and the most appropriate frequency for lubrication for the subject components. BECo will then review and revise, as necessary, affected procedures. These procedures will have been revised and in place by 12/31/83.

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

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: 4/14/89

Marion DeLong
Notary Public