

BOSTON EDISON COMPANY
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

May 3, 1984
BECO Ltr. #84-063

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

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

Subject: Inspection 84-04

Reference: NRC Letter to Boston Edison, dated April 3, 1984

Dear Mr. Starostecki:

This letter is in response to the violation identified during a routine safety inspection conducted by Mr. J. Johnson of your office on February 7, 1984 to March 12, 1984 and communicated to Boston Edison Company in Appendix A of the reference.

Notice of Violation (84-04-01)

Technical Specification 6.8.A and USNRC Regulatory Guide 1.33, Section 4.j, require that procedures be established and maintained for normal operation of the containment ventilation systems.

Contrary to the above, between June 24, 1982 and February 22, 1984, procedures were not properly established and maintained for normal operation of the containment ventilation systems in that Procedure No. 2.2.70, Primary Containment Atmospheric Control, specified the normal position of two, 1-inch nitrogen block valves (H.O. 100 and H.O. 101) as "closed" and, if implemented, would have prevented remote operation of the post-LOCA Containment Atmospheric Dilution System.

Response

The error in the valve checklist in Procedure 2.2.70 occurred during the preparation of Revision 21 to said procedure which was issued on June 26, 1982. However, the subject valves were in the locked open position during the operating segment of the current cycle as verified by successful performance of the Containment Atmospheric Dilution (CAD) System functional test on May 11, 1983 and further verified by visual observance by a licensed operator and witnessed by the Resident Inspector on February 7, 1984.

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Upon discovery of the procedural error, our immediate corrective action was to initiate a revision to the subject procedure to specify the correct position of the block valves (H.O. 100 and H.O. 101).

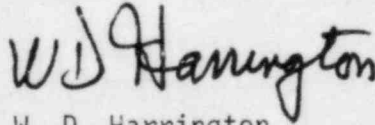
An effort is underway to make improvements to the procedure preparation and revision process including transfer of word processing to site, a streamlining of the "process," and assignment and definition of the responsibility for the proofing of procedures.

Any other discrepancies of a similar nature which may exist in safety-related procedures will be identified and corrected by two existing NRC-approved programs; namely, the Procedure Update Program (PUP) and the Program to Update Design Documents (PUDD) and by the resulting validation process. Both of these programs, PUP and PUDD, are to be completed in October as stated in our Performance Improvement Program.

Full compliance was achieved with the approval and issuance of the revised procedure on February 22, 1984.

If you have any questions or need any further information on this subject, please do not hesitate to contact me.

Respectfully submitted,


W. D. Harrington

PB:caw