

June 14, 1984

Docket No. 50-293

Mr. William D. Harrington
Senior Vice President, Nuclear
Boston Edison Company
800 Boylston Street
Boston, Massachusetts 02199

Dear Mr. Harrington:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - NUREG-0737, ITEM I.C.6,
VERIFYING CORRECT PERFORMANCE OF OPERATING ACTIVITIES

Re: Pilgrim Nuclear Power Station, Unit 1

In order to complete our review of your February 15, 1983 and September 2, 1983 submittals relative to NUREG-0737, Item I.C.6, additional information is needed. Please respond within 30 days of receiving this letter to the three items in the Enclosure.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

Original signed by/

Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

Enclosure:
Request for
Additional Information

cc w/enclosure:
See next page

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Mr. William D. Harrington
Boston Edison Company
Pilgrim Nuclear Power Station

cc:

Mr. Charles J. Mathis, Station Mgr.
Boston Edison Company
RFD #1, Rocky Hill Road
Plymouth, Massachusetts 02360

Resident Inspector's Office
U. S. Nuclear Regulatory Commission
Post Office Box 867
Plymouth, Massachusetts 02360

Mr. David F. Tarantino
Chairman, Board of Selectman
11 Lincoln Street
Plymouth, Massachusetts 02360

Water Quality and
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Department of Environmental
Quality Engineering
100 Cambridge Street
Boston, Massachusetts 02202

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Regional Radiation Representative
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Mr. Robert M. Hallisey, Director
Radiation Control Program
Massachusetts Department of
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Mr. A. Victor Morisi
Boston Edison Company
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Braintree, Massachusetts 02184

REQUEST FOR ADDITIONAL INFORMATION
BOSTON EDISON COMPANY - PILGRIM STATION

SUBJECT: NUREG 0737 Item I.C.6 "Verify Correct Performance of Operating Activities"

REFERENCES:

1. NUREG 0737 Item I.C.6
2. NRC letter (D. Vassallo) to BECo (A. V. Morisi) dated December 20, 1982
3. BECo letter (W. Harrington) to the NRC (D. Vassallo) dated February 15, 1983
4. BECo letter (W. Harrington) to the NRC (D. Vassallo) dated September 2, 1983

In reference (2) the NRC identified several differences between the NRC position on NUREG 0737 Item I.C.6 and the Pilgrim Station procedures. Reference (3) stated that the station policy should conform to I.C.6 considering ALARA and personnel resource requirements and that justification will be provided for any deviation. Reference (4) informed the NRC that Nuclear Operations Procedure (NOP) 8301 titled "Conduct of Operations" incorporating I.C.6 policy was issued June 17, 1983.

After review of the referenced correspondence, NOP 8301, and applicable station procedures the staff believes that the concerns described in reference (2) have not been adequately addressed. In addition, a discussion of deviations between station policy and the guidelines of I.C.6 has not been provided, nor has any justification for such deviations been provided. The following information is requested to complete the NRC staff review of this matter:

1. Describe who is authorized to hang tags, reposition valves, and perform initial component alignment. Define the term "qualified personnel" relative to hanging tags and repositioning valves.
2. Provide the station policy concerning independent verification of tagging for maintenance and for Watch Engineer's tags. Identify or provide copies of the procedure(s) describing this policy.
3. Provide the station policy concerning first and second verification of system realignment following maintenance. Identify or provide copies of the procedure(s) describing this policy.