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March 8, 1985
BECo Ltr. #85-052

Mr. Edward C. Wenzinger, Chief
Projects Branch No. 3
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region I - 631 Park Avenue
King of Prussia, PA 19406

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

Subject: Response to Item of Non-Compliance as
Contained in NRC Inspection No. 84-39

Reference: NRC Letter to Boston Edison, dtd. Feb. 7, 1985

Dear Mr. Wenzinger:

This letter is in response to the Item of Non-Compliance identified during an inspection conducted by Mr. J. Johnson and others of your office on November 21 to December 31, 1984 and communicated to Boston Edison in Appendix A of the reference.

Notice of Violation (84-39-01)

10 CFR 50, Appendix B, Criterion XVI Corrective Action, requires that measures be established to assure that conditions adverse to quality, such as failures, malfunctions and deviations are promptly identified and corrected.

Nuclear Operations Procedure No. 8305 dated May 2, 1984, (The Failure and Malfunction Report Process), and Station Procedure No. 1.3.24, dated April 11, 1984 (Failure and Malfunction (F&M) Reports) require that F&M Reports be initiated for deviations, failures, or malfunctions that could prevent systems from fulfilling their functions. F&M Reports are intended to:

1. Provide prompt notification of important plant conditions and events.
2. Ensure initial internal review and safety assessment of events of potential safety consequences.
3. Provide information for determination of event reportability to the NRC.
4. Document the initiation/completion of (and/or compensatory) immediate corrective action.

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Contrary to the above, measures were not established to assure that conditions adverse to quality are promptly identified and corrected in that procedures 8305 and 1.3.24 do not provide a time limit for initiation of F&M Reports.

As a consequence, in the following cases,

- Deviations in piping supports for the Core Spray and Residual Heat Removal Systems identified during inspections between September 15 - October 7, 1984, but not reported on a F&M Report until November 19, 1984.
- A through wall leak in reactor coolant pressure boundary weld identified on November 30, 1984, but not reported on a F&M Report until December 17, 1984.

The F&M Reports did not provide for prompt notification of important plant conditions, did not ensure initial internal review and safety assessment of events of potential safety significance in that core reload occurred between identification of hanger deficiencies in the RHR and Core Spray Systems and determination of their effect on system operability, did not result in timely notification of NRC via ENS calls in that NRC was not notified until November 19 and December 17, 1984, respectively, of the above two conditions and did not document the initiation/completion of immediate corrective actions.

Corrective Steps Taken to Correct the Condition

Both instances cited above resulted from ambiguity in procedures for initiating F&MR's as existing procedures do not specify when QA personnel are required to generate F&MR's either in lieu of, or in addition to, other corrective action documents. Immediate corrective action in both cases was promptly implemented when Boston Edison became aware of the problem. The appropriate F&MR's were initiated and evaluated for reportability, and, subsequently, ENS reports made to the NRC.

Additionally, as interim corrective action, QA personnel have been specifically instructed as to when and how they are required to initiate F&MR's.

Corrective Steps Taken to Preclude Recurrence

As long-term action to preclude recurrence, applicable Nuclear Organization and departmental procedures are being revised to ensure that conditions or events that could prevent systems from fulfilling their function, including those identified by QA personnel, are brought to the attention of the Watch Engineer in a timely manner. Specifically, the

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revised procedures will ensure (1) the prompt notification of important plant conditions and events, (2) the initial internal review and safety assessment of events of potential safety significance, (3) the timely determination of event reportability to the NRC, and (4) the documentation of the initiation/completion of immediate corrective and/or compensatory action.

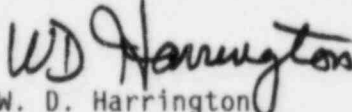
The procedural revisions discussed above are anticipated to be issued for comments within approximately one week's time and, upon implementation, will effectively preclude repetition of the violation.

Date When Full Compliance Was Reached

Full compliance was reached on February 28, 1985, the date upon which QA Department personnel were notified of their responsibilities to issue F&MR's when appropriate.

If you have any questions or concerns regarding the above response, please do not hesitate to contact me.

Respectfully submitted,


W. D. Harrington