

**BOSTON EDISON COMPANY**  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

September 11, 1984  
BECO #84-147

Mr. Stewart D. Ebnetter, Chief  
Engineering Programs Branch  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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

Supplemental Response to IE Bulletin No. 83-07:  
Apparently Fraudulent Products Sold by Ray Miller, Inc.

- References: (a) IE Bulletin No. 83-07, dated July 22, 1983  
(b) Boston Edison Company (BECO) Letter (W. D. Harrington) to NRC (T. E. Murley), dated February 27, 1984  
(c) NRC Letter (S. D. Ebnetter) to BECO (W. D. Harrington), dated June 18, 1984

Dear Sir:

The information contained in this letter was previously transmitted to you on August 15, 1984. You have indicated that you have not received that letter. This letter supersedes our August 15, 1984 submittal and that submittal should be disregarded should it ever be received by the NRC. In all other aspects the information contained in these letters is identical.

In Reference (a) licensees were requested to determine whether suspect material from Ray Miller, Inc. had been installed in plants and to take appropriate action. In addition, Reference (a) requested the following:

"Therefore, although the specific details involving apparently fraudulent materials received from Ray Miller, Inc. may not directly apply for your facility, you are requested to review the general concerns expressed in the Bulletin for applicability at your facility. Your response should describe the results of the review, and if the general concerns apply, you should describe the short-term and long-term corrective actions to be taken and the schedules thereof."

Via Reference (b), BECO responded to Reference (a) and identified that no Ray Miller, Inc. material was used at PNPS, and therefore, no BECO action was required.

8410300259 840911  
PDR ADOCK 05000293  
Q PDR

Stewart D. Ebnetter, Chief  
September 11, 1984  
Page 2

Via Reference (c), the NRC stated the following:

"We note that your response (to Reference (a)) did not include the requested information and ask that you perform this review and provide the results together with any necessary corrective actions, including schedules within 60 days."

The general concerns of Reference (a) are that suppliers may be substituting sub-standard or nonconforming materials when filling orders. Also, this nonconforming material may go undetected and be accepted as conforming material at a nuclear power plant.

The BECo Quality Assurance Program, as defined in the BECo Quality Assurance Manual (BEQAM) and related Quality Assurance Department (QAD) procedures establish controls to minimize the possibility that incorrect material will be supplied for use in safety related applications at Pilgrim Station.

These controls include the following specific elements:

- a. Supplier selection, evaluation, and approval with annual re-evaluation.
- b. Receipt inspection and testing per predetermined requirements as deemed necessary to assure adequate quality for the intended application.
- c. Source inspections and audits, if warranted by the complexity of the item and manufacturing process.
- d. Requirements for supplier documentation and certificates of conformance to provide auditable or verifiable data. Also, requirements are imposed on the content of C of C.

In light of the concerns of Reference (a) BECo QAD will reemphasize the use of audits, source inspection, and receipt inspection and testing to verify the quality of items. Per BECo QAD procedures, the degree of emphasis on various types of inspections is determined by review of the safety related functions of the item being procured.

The above discussion details the results of our review of our Quality Assurance Program as it applies to the general concerns outlined in IE Bulletin 83-07. Should you require any additional information, please contact us.

Very truly yours,

*W.D. Hamington*