

BOSTON EDISON COMPANY  
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WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

October 26, 1984  
BECO Ltr. #84-182

Mr. Thomas T. Martin  
Division of Engineering and Technical 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: Response to Items of Non-Compliance as Contained  
in NRC Inspection No. 84-23

References: NRC Letter to Boston Edison, dated October 2, 1984

Dear Mr. Martin:

This letter is in response to the Item of Non-Compliance identified during an inspection conducted by Mr. J. Johnson of your office on July 23 - August 27, 1984 and communicated to Boston Edison Company in Appendix A of the reference.

Notice of Violation (84-23-01)

Technical Specification 4.9.A.2.c requires that a rated load discharge test be performed once each operating cycle for the station 125 and 250 volt batteries. The specific gravity and voltage of each cell are required to be determined after the discharge and logged. Station Procedure No. 8.9.8, "Battery Rated Load Discharge Test," Revision 6, requires that the starting specific gravity and voltage readings on each cell be taken and recorded after isolating the battery (from the charger and distribution bus).

Contrary to the above, as of August 7, 1984, the specific gravity of station 125 and 250 volt batteries was not determined or logged after the rated load discharge and before recharge. In addition, on August 7, 1984, the starting specific gravity and voltage readings for the 250 volt battery were taken before isolating the battery.

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Response

Regarding the departure from Technical Specification 4.9.A.2.C cited above, Boston Edison agrees that the specific gravity of the station 125 and 250 volt batteries was not determined or logged before recharging on August 7, 1984. This departure was caused by an inconsistency between the test sequence stipulated by the then current revision of Station Procedure 8.9.8 and the sequence established by the referenced Technical Specification. As the inspector observed, the procedure for testing the batteries did not require that the specific gravity readings be taken and logged after discharge and before recharge.

Because of this event, Boston Edison's Nuclear Engineering Department (NED) was requested to determine when in the sequence, specific gravity readings should be taken. NED's evaluation concluded that specific gravity readings should be taken after recharging, but prior to returning the batteries to service. Therefore, Boston Edison's position is that Technical Specification 4.9.A.2.C as written is unclear in that it appears to indicate that specific gravity readings must be taken directly after discharge.

Interim corrective action was to revise Station Procedure 8.9.8 which now requires the taking of specific gravity readings both after discharging and after recharging the batteries. The batteries were subsequently tested to the revised procedure.

Since Boston Edison believes that the Technical Specification is unclear, further corrective action will be to revise Section 4.9.A.2.C to make it clear that specific gravity readings are required to be taken only after recharging and prior to returning the batteries to service.

Regarding the second item identified by the inspector, specific gravity readings were taken before the 250 volt battery was isolated from the DC system, rather than after as required by PNPS 8.9.8. This occurrence does represent an individual's failure to follow station procedures. However, the individual took the readings in a sequence that is technically correct per the criteria of IEEE 450, Section 5.1, which serves as a test reference.

Therefore, this incident prompted two distinct corrective actions. Firstly, the individual involved has been instructed on the importance of adherence to station procedures and also on the procedure to be followed when deviations from procedures are deemed necessary. Secondly, Procedure 8.9.8 will be revised to comply with IEEE 450, Initial Conditions, for when specific gravity readings shall be taken, that is, prior to disconnecting the battery from the charger.

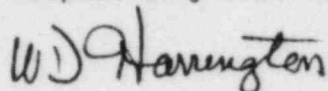
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Based upon the above, we believe Boston Edison is in full compliance.

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

Respectfully submitted,

A handwritten signature in cursive script that reads "W. D. Harrington". The signature is written in dark ink and is positioned above the printed name.

W. D. Harrington