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SENIOR VICE PRESIDENT
NUCLEAR

February 12, 1985

BECo 85-031

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

License DPR-35
Docket 50-293

Response to Systematic Assessment of
Licensee Performance (SALP) Report No. 84-34

Dear Sir:

We have reviewed and evaluated your assessment report of our operation of Pilgrim Nuclear Power Station. As you know, the major portion of the assessment period encompassed an outage of exceptional scope and duration. During this period management and operations were severely tested. We believe a fair assessment of our performance during the past evaluation needs to consider the extraordinary circumstances of that period. In that context, we suggested some areas of disagreement with your findings during the meeting of February 23, 1985. We request your consideration of those areas and their circumstances as you review the attached comments.

Very truly yours,

WD Harrington

ERM/ns

Attachments

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Attachment

PLANT OPERATIONS

Staffing

NRC Assessment

Additional management attention is required to recruit and train operators.

BECo Perspective

Operations is currently authorized 16 management and 29 NPO positions. At present, only 5 positions remain to be filled as follows:

(1) Nuclear Watch Engineer
(2) Nuclear Operating Supervisors
(2) Nuclear Plant Operators

One of the Nuclear Operating Supervisor vacancies is due to a recent resignation, and both NPO vacancies are due to recent losses in the group.

We believe that our efforts on recruitment have been exceptional.

Concerning our attention to training, we believe that management has shown considerable attention based on the fact that we did postpone our last licensing exam for 3 months and, as a result of increased attention, 6 out of 10 individuals were licensed and 3 of the remaining 4 were close to the passing grade. We have 5 NPO's in a Tour Qualification Program and have scheduled 7 NPO's for Reactor Operator training commencing 3 March 1985.

CONDUCT OF OPERATIONS

NRC Assessment

Several problems were observed regarding safety system procedure preparation and implementation.

BECo Perspective

The examples used for this assessment were improper operation of core spray system vent valves and repetitive errors in the position specified in one procedure (2.2.70) for a containment block valve. The CS drain valves in between 1400-24 & 25 were being used by Operations to ensure headers were full instead of the high point vent valves as required by procedure. This was being done because the vent valves were approximately 20 feet off the floor and considered a safety hazard, whereas the drains off the same section of pipe were at waist level. Once management was made aware of the problem, a modification was implemented to correct the problem.

The incident involving the error in the procedure on the position of a containment block valve occurred because of the way we used to process procedure changes (i.e., use of typing pool at Prudential). The valves involved were the subject of a 10CFR50.54 fine and, when the original

problem was identified by BECo, the procedure was revised on-site to correct the specified position; however, the change was not transmitted to the offsite typing pool to change the computerized data. A subsequent revision to add numbers to these valves was processed through normal means and, when the procedure came out of the typing pool, it reverted back to the wrong position.

Procedure revisions are now processed on-site with a computerized data base and immediate revisions are made to that data base and, with the completion of the Procedure Update Program, these kinds of problems should not recur.

NRC Assessment

Increased management attention is considered necessary to ensure that safety-related activities such as valve alignments, maintenance, and testing are independently verified.

BECo Perspective

The Procedure Update Program is essentially complete. All system procedures and operations surveillance procedures have been revised, and the majority of the maintenance surveillance procedures have been revised to include independent verification. The remaining maintenance procedures have been revised, but not yet approved by ORC. Station management, however, is committed to approving each remaining procedure before the next required use of that procedure.

In addition, Procedure 1.3.34, "Conduct of Operations," was revised to specify what system categories must be independently verified, when, and by whom. The only remaining issue is to revise the Maintenance Request form to provide documented evidence of independent verification following maintenance activities.

TRAINING

As discussed at the January 23 meeting, we performed a major re-assessment of our training methodologies and discovered areas we believe need improvement. Specifically, through our own self-evaluation and an independent evaluation by General Electric Company of our candidates, we acknowledged that although we have put together an excellent cadre and have a new dedicated training facility, the training program itself couldn't turn out the desired product. As a result, immediate decisive action was taken to revamp the structure, faculty, and testing methods. Essentially, we will utilize 1985 as an improvement year for our training program and staff.

RADIOLOGICAL CONTROLS

We concur with the assessment of the SALP Report and feel very strongly that our implementation of our Radiological Improvement Program will ensure positive results in future assessments.

MAINTENANCE

We recognize the positive comments and acknowledge the Category 1 rating with pleasure. We will continue our improvement posture in program areas to sustain the current assessment.

SURVEILLANCE

We acknowledge this Category 1 rating and concur with the NRC evaluation. We intend to continue this high standard of performance for the present and future.

FIRE PROTECTION/HOUSEKEEPING

As discussed during the SALP meeting on January 23, 1985, the NRC discussion of supporting information does not appear to substantiate the stated conclusion, i.e., Category 2, declining (during the SALP period). With the exception of one negative paragraph dealing with the root cause of potential problems with fire doors and penetrations, the entire discussion of this category is positive and supportive of a Category 1 ranking.

Regarding the fire doors and penetration seals, although the doors were reported as non-functional in the LER, they were subsequently analyzed and determined to be functional. Further testing and modification is planned to restore design margins. Of the approximate 6000 fire penetration seals inspected during the outage, 38 were declared as non-functional and reported in LER 84-07. A subsequent engineering evaluation determined that only 12 of these needed repairs to satisfy Technical Specification requirements.

Notwithstanding the above, management continued to exhibit aggressiveness, concern and attention to fire protection. An innovative approach of using dual-qualified Fire Inspector/Emergency Medical Technicians provided strict compliance to fire protection procedures; outstanding commitment was demonstrated by providing fire inspection coverage on a 24 hour per day basis during the outage; effective results were demonstrated because no significant fires occurred despite the extremely difficult construction conditions encountered during the recirculation piping replacement outage.

Similarly with housekeeping, strong management commitment and success were evident. In addition to the excellent fire protection results, good housekeeping contributed to an outstanding safety record, as no lost-time injuries were experienced by licensee employees for the duration of the outage.

Frequent visits from the corporate and executive office and positive results demonstrate continued strong management commitment, a strength which was noted in the 1983 SALP Report.

The plant cleanup (area decontamination) program is an aggressive licensee initiative which was begun during the SALP reporting period. Because of the extensive maintenance and modification work throughout the plant, the identified work scope was not completed during the outage but is currently reported to be approximately 70% complete. The required continued effort for the future is recognized, with planning in progress. Management commitment and resource allocation remains strong.

Based on the results achieved during the reporting period, management attention and involvement has been aggressive and oriented to nuclear safety; resources are ample and effectively used so that a high level of performance is being achieved with respect to operational safety.

SECURITY AND SAFEGUARDS

The current organization dealing with this functional area was established in June 1983, and staffed early in the SALP reporting period. During the settling-in period we had recognized the desire to affect improved performance on the part of the contractor security force. Management oversight was increased in the form of unannounced, back-shift audits of the security force; security-related infractions were actively sought-out, reported, and the findings assessed and actions taken to provide improvement; efforts were initiated to increase the level of awareness of site personnel regarding security issues; a Nuclear Operations Procedure (NOP) was developed and issued to provide availability and use of a non-safeguard information security program document; a corporate security investigator provided full-time on-site support for a large portion of the recirculation piping replacement outage; and finally, significant pressure was initiated with the corporate management of the contractor security force as a result of minor problems discovered during the last security inspection.

Management attention was also manifested in other ways. Following the last security inspection, BECo management initiated prompt, thorough and effective corrective action on the identified violations; a corporate vice-president of the contractor security force was invited to a management conference to discuss actions to improve security force performance. The contractor agreed to provide internal audits utilizing off-site support; BECo requested and was granted a management conference at Region I to discuss actions taken and planned: Finally, BECo arranged to conduct the annual security audit earlier than originally scheduled, and to use an independent consultant to conduct the audit.

The actions described above demonstrate strong management attention and commitment to an effective physical security program.

EMERGENCY PREPAREDNESS

Boston Edison recognizes that shortcomings in the 1984 exercise scenario, and in the mechanisms utilized to present scenario data to exercise participants, resulted in a dysfunction which prevented NRC observers from validating the continued effectiveness of the decision-making process for developing protective action recommendations and communicating these to off-site officials. Immediately subsequent to the 1984 exercise, Boston Edison committed to the conduct of a remedial drill in November, 1984, during which these key functions would be observed. This remedial drill was held outside the assessment period, and Boston Edison has not received the relevant inspection report, but recognizes the positive comments offered by the NRC at our meeting of January 23, 1985, relative to satisfying the principal concerns raised during the August, 1984 exercise.

The problems encountered during the August, 1984 exercise also raised concerns relative to Boston Edison's emergency preparedness training program and the self-critique process. During our January 23, 1985 meeting, Boston Edison pointed out that a new eight unit training program had been implemented by the Training Department during 1984, and that Boston Edison had committed in August, 1984, to expand this program by adding a unit on effective participant conduct during drills and exercises. This additional unit was developed and validated in anticipation of the November, 1984 drill. It will be administered to

members of the emergency organization during 1985. Further, it is Boston Edison's intention to conduct "table-top" assessment and protective action recommendation development exercises in the context of future emergency preparedness training.

The 1984 SALP report also noted that the self-critique following the August 1984 exercise did not identify several minor problem areas. As noted during the January 23, 1985 meeting, we believe that this observation was also the result of the problems encountered during the August exercise, and that Boston Edison had demonstrated rigorous and effective critique capabilities in both 1982 and 1983. Boston Edison management will assure that the effectiveness of the processes to independently evaluate emergency preparedness capabilities are maintained, and that the 1985 post-exercise critique is both comprehensive and rigorous.

The 1984 SALP report also addresses habitability and space limitations of the existing Emergency Operations Facility (EOF) but notes that Boston Edison recognizes the need for a new EOF, and has taken steps to negotiate a new permanent facility with Plymouth County officials. (Boston Edison was notified in December, 1983, that the existing EOF was considered unsuitable because it did not meet the habitability criteria of NUREG 0737, and was asked to develop an alternative EOF concept.) During the January 23, 1985 meeting, an additional concern was raised relative to how the EOF would function in the context of interface with the considerable federal resources which could be brought to bear following implementation of the Federal Radiological Emergency Response Plan, as demonstrated during the federal/state/utility exercise at St. Lucie in 1984. This matter will be followed up between Boston Edison and Region I.

Boston Edison has opted for a near-site (3 miles) EOF to assure rapid integration of the augmented emergency response team. We have committed to a 10,000 square foot facility, 5,000 square feet of which will be dedicated EOF space. In considering both size and location, Boston Edison considered both the size and location of the new St. Lucie EOF. Representatives of Boston Edison and the architect/engineer for the new EOF will visit St. Lucie in early February. Boston Edison has also initiated a unique assistance program for the Commonwealth of Massachusetts, in cooperation with the Federal Emergency Management Agency and Yankee Atomic Electric Company which is intended, in part, to ensure smooth integration of federal response capabilities into the overall response effort.

Senior management appreciates the helpfulness of NRC comments during the January 23 meeting, and will ensure that concerns expressed are effectively addressed.

REFUELING AND OUTAGE MANAGEMENT

We are particularly pleased with the rating received in this area. The concept of an Outage Management section dedicated to planning, scheduling and managing all outage tasks worked extremely well for its first trial. The experience gained through implementation of this innovative form of task management will be applied during the current operating cycle. Additionally, we will be fine tuning the programmatic aspects to enhance the work flow process in areas we feel could be improved.

LICENSING ACTIVITIES

We acknowledge the Category 1 rating and concur that the NRC evaluation is accurate. Senior management maintained an active involvement in this functional area with the specific objective of assuring that quality responses be provided in a timely fashion. Overall, we believe we met that objective and appreciate the latitude afforded by the NRC to re-prioritize or postpone work when outage-related manpower constraints necessitated the shuffling of tasks to meet schedule demands elsewhere. Those tasks which were postponed will be among our highest priorities as well as maintaining the high standard of performance reflective of this Category 1 rating.