

April 16, 1996

E. Thomas Boulette, PhD
Senior Vice President - Nuclear
Boston Edison Company
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, Massachusetts 02360-5599

SUBJECT: 40500 TEAM INSPECTION, INSPECTION REPORT NO. 50-293/96-80

Dear Mr. Boulette:

From January 22, 1996 through February 9, 1996, a team of inspectors led by Mr. W. Cook conducted a 40500 Team Inspection at the Pilgrim Nuclear Power Station, Plymouth, Massachusetts. The inspection was conducted to evaluate the effectiveness of your processes for identifying, resolving, and preventing issues that degrade the quality of plant operations and safety. As part of the inspection, the NRC conducted a close examination of a number of operational events to help focus the team's review of your corrective action processes. During the inspection, the NRC found a number of instances where procedures were either inadequate or not followed and these inadequacies contributed to the operational events. The NRC also found that BECo did not identify or sufficiently address procedure usage causal factors for these events. The findings were discussed with Mr. L. Olivier and other members of your staff at the conclusion of the inspection.

Based upon the team's procedural usage observations derived from the review of operational events, the team's broader examination of the station corrective action processes identified additional examples, throughout your organization, of inadequate and poor procedure implementation. Accordingly, the collective examination of these procedure inadequacies and apparent procedural noncompliances indicated a broad individual and organizational performance problem which was missed by BECo's root cause analysis process and your independent oversight groups' activities.

The failure to properly develop and/or adhere to established procedures, as well as, the failure to identify and correct the observed broad procedure usage performance problems, constitute apparent violations of NRC requirements. The NRC is still evaluating enforcement action for these apparent violations. Prior to making a decision, it is request that you examine the team's observations in this area and provide a written response to address your perspective on these matters. We ask that you include in your response the corrective actions you have taken or planned to address these issues and the estimated completion dates, if any. Further, please address why your organization, along with your independent oversight groups, were not

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successful in identifying this broad performance problem and any corrective actions taken or planned, including targeted completion dates. We request your response within 60 days of the date of this letter.

The team's review of recent Maintenance Program improvement initiatives identified an enhanced program and a well defined work control process. The overall effectiveness of these program improvement initiatives continues to be reviewed by the NRC staff via the ongoing inspection program. However, the team identified some post-work testing deficiencies which suggested additional examples of inadequate procedural use, as noted above.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures, and your response will be placed in the NRC Public Document Room. The responses requested by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Richard W. Cooper, Director
Division of Reactor Projects

Docket No.: 50-293

Enclosure: NRC Inspection Report No. 96-80

c w/encl:

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T. Sullivan, Plant Manager
N. Desmond, Regulatory Relations
D. Tarantino, Nuclear Information Manager
R. Hallisey, Department of Public Health, Commonwealth of Massachusetts
The Honorable Therese Murray
The Honorable Linda Teagan
B. Abbanat, Department of Public Utilities
Chairman, Plymouth Board of Selectmen
Chairman, Duxbury Board of Selectmen
Chairman, Nuclear Matters Committee

Mr. E. Thomas Boulette, PhD

3

Plymouth Civil Defense Director

Paul W. Gromer, Massachusetts Secretary of Energy Resources

Bonnie Cronin, Legislative Assistant

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Regional Administrator, FEMA

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Mr. E. Thomas Boulette, PhD

4

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