

BOSTON EDISON COMPANY
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BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

July 6, 1984
BECO Ltr. #84-97

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: Inspection 84-13

References: NRC Letter to Boston Edison, dated June 8, 1984

Dear Mr. Martin:

This letter is in response to the three violations and one deviation identified during a routine safety inspection conducted by Mr. P. Clemons of your office on April 24-27, 1984 and communicated to Boston Edison Company in Appendices A and B of the reference.

Notice of Violation (84-13-01)

Technical Specification 6.8.A states, "Written procedures and administrative policies shall be established, implemented, and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix 'A' of USNRC Regulatory Guide 1.33..."

Technical Specification 6.8.B states, "Each procedure...and changes thereto, shall be reviewed by the ORC and approved by the ORC Chairman prior to implementation..."

Contrary to the above, the licensee had used three contractor procedures during 1984, and the procedures have not been reviewed by the ORC (Operating Review Committee) and neither have they been approved by the ORC Chairman.

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Mr. Thomas T. Martin
U.S. Nuclear Regulatory Commission
July 6, 1984
Page 2

Response

We are not in full agreement with the violation in that the three subject contractor procedures are initially and continually reviewed by Boston Edison Waste Management personnel for technical appropriateness and congruence with the parent Boston Edison procedure. The contractor procedures are also referenced in the parent Boston Edison procedure and therefore receive, in essence, the required ORC review.

However, we acknowledge the inspector's observation that it may sometimes be appropriate to incorporate technical information/instructions from referenced contractor procedures into the text of the parent procedure. Therefore, we are now conducting a review of contractor radwaste shipment preparation procedures and, if any material is found that should be incorporated into the parent Boston Edison procedure(s), then the appropriate procedure revisions will be made.

Notice of Violation (84-13-02)

10CFR71.12(c) requires that a person using a package to transport licensed material must have a copy of the Certificate of Compliance, and the person must also comply with the conditions of the Certificate.

1. Certificate of Compliance No. 6601, Revision No. 13, Condition 5(b)(2) requires that the decay heat load not exceed 40 thermal watts.

Contrary to the above, the licensee did not determine the decay heat load of a package of 118 curies of licensed material shipped on February 10, 1984, having the Certificate of Compliance No. 6601.

2. Condition 10 of Certificate of Compliance 6601, Revision No. 13, states, "For all packages containing residual water or other substances which could radiolytically generate combustible gases, a determination must be made by tests and measurements of a representative package such that the following criteria are met over a period of time that is twice the expected shipment time:
 - (i) The hydrogen generated must be limited to a molar quantity that would be no more than 5% by volume (or equivalent limits for other inflammable gases) of the secondary container gas void if present at STP (i.e., no more than 0.063 g. moles/ft³ at 14.7 psia and 70°F); or
 - (ii) The secondary container and cask cavity must be inerted with a diluent to assure that oxygen shall be limited to 5% volume in those portions of the packages which could have hydrogen greater than 5%.

Mr. Thomas T. Martin
U.S. Nuclear Regulatory Commission
July 6, 1984
Page 3

For packages to be delivered to a carrier for transport, the secondary container must be prepared for shipment in same manner in which determination for gas generation is made..."

Contrary to the above, on February 10, 1984, the licensee used package Model No. CNSI 8-120, Certificate of Compliance 6601, to transport 118 curies of licensed material to Barnwell, South Carolina, and the licensee did not determine by tests or measurements that the criteria described above were met.

Response

We disagree with the alleged violation. The first item states that "The licensee did not determine the decay heat load of a package of 118 curies of licensed material shipped on February 10, 1984..." Procedure 6.9-165 ("Handling and Loading Procedure CNS 8-120 Shipping Cask") requires a Shipping Cask Checkoff Sheet to be filled out for every cask shipment. Item (4) of that sheet stipulates that we not exceed twenty thermal watts and requires the individual to initial the item, indicating that he/she has performed the required calculations.

It is our policy to use a (60) curies = 1 watt rule to determine compliance with these limits. This rule is conservatively based on an average isotopic analysis of our reactor water. In the case of the shipment in question, the thermal wattage was calculated to be approximately (2) thermal watts, or one-twentieth the limit imposed by Condition 5(b)(2) of the Certificate of Compliance.

In regard to the second item of the alleged violation, it is our position that we are in compliance with Condition 10 of the Certificate of Conformance. Since not only the cask in question, but all casks are de-watered to comply with burial site criteria, our packages do not "contain residual water" as Condition 10 states. Secondly, Condition 10 specifies that (tests must be conducted on packages which) "contain substances which could radiolytically generate combustible gases." It is our position that our casks do not fall under this second category since (1) Pilgrim Station does not use Nitrites nor Nitrates in their primary fluid process which could possibly cause an exothermic reaction, and (2) all our shipments are well below the 10^8 Rad which could generate H_2 gases through the radiolytic breakdown of water.

Notice of Violation (84-13-03)

10CFR71.101(b) requires each license to establish a quality assurance program for packages. 10CFR71.101(f) states that a Commission approved quality assurance program which satisfies the applicable criteria of Appendix B of Part 50 of this chapter, and which is established, maintained, and executed with regard to transport packages will be accepted as satisfying the requirements of paragraph (b) of this section. Paragraph (b) requires that licensees establish, maintain, and execute a Quality Assurance Program.

Mr. Thomas T. Martin
U.S. Nuclear Regulatory Commission
July 6, 1984
Page 4

Criterion II, Appendix B of Part 50, of the licensee's previously approved program requires that the licensee identify the structures, systems, and components to be covered by the quality assurance program.

Contrary to the above, as of April 27, 1984, the licensee has not identified transport packages as a structure, system, or component to be covered by the quality assurance program.

Response

The problem of appropriately identifying the subject transport packages was identified prior to Mr. Clemons' inspection and Boston Edison had since taken the following corrective action which brings us into full compliance with the requirements of 10CFR71.101 and should address the inspector's concerns.

On April 12, 1984, Revision 15 to the Boston Edison Quality Assurance Manual was issued to change Paragraph 2.4.4 in order to more specifically address shipping containers and/or transport packages used at Pilgrim Station. The revised paragraph reads as follows:

"In accordance with the requirements of 10CFR71.51, the BEQAM is also applied to Boston Edison activities, including procurement activities, related to delivery of licensed material to a carrier for transport under the license provisions of 10CFR71.12. Applicable shipping containers or transport packages are identified by procedures in Volume VI, Section 6.9, of the PNPS Operations Manual; BECo's authorization to use these containers and packages is identified in NRC letter to Holders and Registered Users of Certificate of Compliance for Radioactive Material Packages."

Therefore, the above action constitutes correction of the violation and adequate corrective action to preclude recurrence, since the above item represents an isolated situation.

Notice of Deviation (84-13-04)

As a result of the inspection conducted on April 24-27, 1984, and in accordance with the NRC Enforcement Policy (10CFR2, Appendix C) published in the Federal Register on March 9, 1982 (47 FR 9987), the following deviation was identified:

In your letter to the Commission, dated July 19, 1982 (BECo Ltr. #82-196), in response to Inspection Report No. 50-293/82-06 you stated, "We are in the process of developing the associated course content, lesson plans, and a training schedule. This process is scheduled for completion by January 1, 1983, and full compliance shall be achieved at that date."

To preclude recurrence of failing to implement commitments, we have developed a commitment tracking system, which is now in place."

Mr. Thomas T. Martin
U.S. Nuclear Regulatory Commission
July 6, 1984
Page 5

Contrary to the above, it was determined that you were not in full compliance with your commitment to IE Bulletin 79-19 by January 1, 1983, and it was also determined that your commitment tracking system did not detect the fact that you were not in full compliance with your commitment.

Response

Our interpretation of the commitment differs from the Commission's in that BECo Letter #82-196 committed to developing course content, lesson plans, and a schedule for training. The development of these three products was accomplished by 1/1/83 in accordance with our statement. As stated in the text of Inspection Report 84-13, the training itself was accomplished later in 1983.

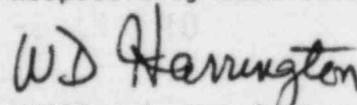
During the course of the inspection, the inspector questioned why QC personnel (who have the responsibility of inspecting radwaste shipments) had not received 79-19 training. The Nuclear Training Department had not administered 79-19 training to the group due to the fact that the inspectors are qualified in radwaste packaging and shipping through a course which meets and exceeds the scope of 79-19 requirements.

In spite of our disagreement on this alleged deviation, let us summarize recent developments and planned actions which Boston Edison has undertaken to assure continued compliance with the requirements of 79-19 training:

- o The Nuclear Training Department has recently completed an assessment to identify personnel requiring 79-19 training.
- o By July 6, 1984, all appropriate Group Leaders will be notified of current personnel training status on 79-19 requirements.
- o By July 13, 1984, existing 79-19 lesson plans will be revised to reflect changes to 10CFR, as appropriate.
- o Affected personnel will have been trained/retrained on 79-19 requirements by 12/31/84.
- o A management control system will be developed in order to insure that all Station personnel requiring 79-19 training receive it in a timely manner.

If you have any further questions or require additional information regarding the above issues, please do not hesitate to contact me.

Respectfully submitted,


William D. Harrington

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JAM O. HARRINGTON
SE VICE PRESIDENT
SAR

July 19, 1982

BECO. Ltr. #82- 196

Mr. Thomas T. Martin, Director
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Programs
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

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

Ref: (A) NRC Letter dated June 21, 1982,
IE Inspection No. 50-293/82-06

Subject: IE Inspection No. 50-293/82-06

Dear Sir:

This letter provides Boston Edison's response to the deviation contained in Reference (A), the result of a routine safety inspection conducted at Pilgrim Nuclear Power Station on February 10-12, 1982.

Appendix A, Notice of Deviation

In your letter to the Commission dated October 2, 1979 (BECO Letter No. 79-193), in response to IE Bulletin No. 79-19, you stated that a training and periodic retraining program would be developed and instituted by October 1, 1980, for employees who operate the processes which generate waste to assure that the volume of low level radioactive waste is minimized... Additionally, followup during NRC Region I Inspection No. 50-293/79-19 resulted in a further commitment to establish and implement a formal training and periodic retraining program for those personnel involved in the transfer, packaging, and transport of radioactive material. This program was to be in effect by May 1, 1980.

Contrary to the above, the referenced training and periodic retraining program had not been developed and instituted by

Mr. Thomas T. Martin, Director
July 19, 1982
Page 2

Response to Appendix A, Notice of Deviation (292/82-02-01)

On June 1, 1982, a revision to the Pilgrim Nuclear Power Station Training Manual was made concerning the requalification of Nuclear Auxiliary Operations, which covers the transfer, packaging and transport of radioactive material. In addition, this training program shall also address the minimization of low-level waste, and shall be provided to employees who operate processes which generate such waste.

We are in the process of developing the associated course content, lesson plans and a training schedule. This process is scheduled for completion by January 1, 1983, and full compliance shall be achieved at that date.

To preclude recurrence of failing to implement commitments, we have developed a commitment tracking system, which is now in place.

We believe this response satisfactorily addresses the deviation identified in Reference (A). Should you have any further questions concerning this response, please contact us.

Very truly yours,

W.D. Harrington

Commonwealth of Massachusetts }
County of Suffolk }

Then personally appeared before me W. D. Harrington, who, being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company, the applicant herein, and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My Commission expires:

October 21, 1988

Peter M. Kahler
Notary Public