

AUG 21 1992

Docket No. 50-293

Mr. Roy A. Anderson
Senior Vice President-Nuclear
Pilgrim Nuclear Power Station
Boston Edison Company
RFD #1 Rocky Hill Road
Plymouth, Massachusetts 02360

Dear Mr. Anderson:

SUBJECT: 10 CFR 50.54 QUALITY ASSURANCE PROGRAM CHANGE REVIEW

References: Boston Edison Company Letter 92-067 dated June 24, 1992, from
R. A. Anderson to the U. S. Nuclear Regulatory Commission transmitting a
proposed change to the Boston Edison Quality Assurance Manual (BEQAM)

We reviewed your 10 CFR 50.54(a) submittal, referenced above, transmitting the proposed change to the Quality Assurance Program for Pilgrim Nuclear Power Station. Based on Region I staff review of this Boston Edison Quality Assurance Manual (BEQAM) submittal, several questions arose which warranted further clarification. These questions were discussed with your staff via phone conversations on August 7, 10, and 18, 1992. The only issue, which required a modification to your submittal, dealt with the independent review of the disposition of nonconforming items. Your change proposed to delete a requirement from Section 15 of the BEQAM which required the Quality Assurance Department to independently approve "accept" and "repair" dispositions that affect the quality assurance requirements associated with nonconforming items; however, the proposed change did not identify the level of review and independency which would be required for nonconforming item dispositions in the future. As a result of the telephone conversations identified above, Mr. S. Bibo of your staff agreed to add the sentence, "This evaluation, justification, and approval is subject to the appropriate controls of Section 3 of the BEQAM," to BEQAM, Volume II, Section 15, Paragraph 15.2.9a. A copy of the revised portion of the BEQAM was subsequently telefaxed to the Region I staff. The Region I staff reviewed these clarifications and found that they appropriately identify the independency and level of reviews required for approving nonconforming item dispositions. Therefore, the Region I staff concluded that the proposed changes to the BEQAM, including the supplementing clarifications, are acceptable in that the Quality Assurance Program continues to satisfy the criteria of Appendix B of 10 CFR Part 50. If there are changes to other operative QA

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commitments existing in docketed correspondence outside of the QA program description, you are obligated to notify this office. Implementing such changes should be based on 10 CFR 50.54(a)(3). The effectiveness of your Quality Assurance Program and procedure implementation will continue to be the subject of routine regional inspections.

If you have any questions concerning this above, please contact Fred Bower at (215) 337-5199.

Sincerely,

*Original Signed by
Norman J. Blumberg for*

Lee H. Bettenhausen, Chief
Operations Branch
Division of Reactor Safety

cc:

E. Boulette, Vice President, Nuclear Operations and Station Director
E. Kraft, Plant Manager
V. Oheim, Manager, Regulatory Affairs Department
D. Tarantino, Nuclear Information Manager
N. Desmond, Compliance Division Manager
R. Hallisey, Department of Public Health, Commonwealth of Massachusetts
R. Adams, Department of Labor and Industries, Commonwealth of Massachusetts
The Honorable Edward M. Kennedy
The Honorable John F. Kerry
The Honorable Edward J. Markey
The Honorable Edward P. Kirby
The Honorable Peter V. Forman
B. McIntyre, Chairman, Department of Public Utilities
Chairman, Plymouth Board of Selectmen
Chairman, Duxbury Board of Selectmen
Plymouth Civil Defense Director
Paul W. Gromer, Massachusetts Secretary of Energy Resources
Sarah Woodhouse, Legislative Assistant
A. Noguee, MASSPIRG
Regional Administrator, FEMA
Office of the Commissioner, Massachusetts Department of Environmental Quality
Engineering
Office of the Attorney General, Commonwealth of Massachusetts
T. Rapone, Massachusetts Executive Office of Public Safety
Chairman, Citizens Urging Responsible Energy
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
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bcc:

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