

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No.: 50-293/85-25

Docket No.: 50-293

License No.: DPR-35 Category C

Licensee: Boston Edison Company M/C Nuclear
25 Braintree Hill Office Park
Braintree, Massachusetts 02184

Facility Name: Pilgrim Nuclear Power Station

Meeting At: NRC Region I, King of Prussia, PA

Meeting Date: August 27, 1985

Prepared By: *J. E. Tripp*
McBride, Resident Inspector

9/12/85
Date

G. Smith
G. Smith, Physical Security Inspector

9/12/85
Date

Approved By: *J. E. Tripp*
L. Tripp, Chief, Reactor Projects Section 3A

9/12/85
Date

R. Keimig
R. Keimig, Chief, Safeguards Section, NMSS

9-12-85
Date

Meeting Summary:

An Enforcement Conference was held at NRC Region I, King of Prussia, Pennsylvania on August 27, 1985 to discuss the findings of two Special Inspections, Nos. 50-293/85-21 and 50-293/85-24. The first special inspection concerned two instances where timely corrective actions were not taken for abnormal surveillance test findings. The second special inspection concerned the identification of a degraded vital area barrier. The adequacy of secondary containment, licensed operator staffing, and environmental qualification of plant equipment were also discussed.

The meeting was attended by NRC and licensee management and lasted about two hours.

DETAILS

1. Participants

a. Boston Edison Company

W. Harrington, Senior Vice President, Nuclear
A. Oxsen, Vice President, Nuclear
C. Mathis, Nuclear Operations Manager
E. Ziemianski, Nuclear Operations Support Manager
M. Brosee, Chief Maintenance Engineer

b. Nuclear Regulatory Commission

T. Murley, Regional Administrator
R. Starostecki, Director, Division of Reactor Projects
T. Martin, Director, Division of Radiation Safety and Safeguards
E. Wenzinger, Chief, Projects Branch 3
J. Joyner, Chief, Nuclear Materials Safety and Safeguards Branch
L. Bettenhausen, Chief, Operations Branch
L. Tripp, Chief, Projects Section 3A
R. Keimig, Chief, Safeguards Section
M. McBride, Resident Inspector, Pilgrim
G. Meyer, Project Engineer
G. Smith, Safeguards Specialist
R. Nimitz, Senior Radiation Specialist
A. Shropshire, Acting Enforcement Coordinator

2. Security Concerns

At the start of the conference, Mr. Martin summarized Region I's understanding of the circumstances relative to the licensee's identification of a degraded vital area barrier on August 1-3, 1985, which led to NRC Inspection No. 50-293/85-24 on August 6-8, 1985. The inspection was conducted to review the licensee's actions taken after finding two openings in the barrier. That re-active inspection identified two additional openings in the same barrier even though the licensee had inspected the barrier and declared it to be sound. These additional openings resulted in an apparent violation of NRC requirements. Mr. Martin expressed concern that the corrective actions and inspections, initiated by the licensee relative to the first two openings identified, were not adequate to identify the two additional openings found by the inspector. Mr. Martin also expressed concern regarding the effectiveness of the licensee's control over contractors, since the first opening identified by the licensee apparently resulted from a contractor removing a portion of the vital area barrier for installation of fire protection piping. Neither the licensee nor the contractor assured that the barrier was replaced.

The licensee stated that the BECo Security Plan committed to meet the intent of 10 CFR 73.2, and did not consider the 96 square inch criterion identified in NUREG-0908 as hard and fast guidance. Mr. Martin stated that 10 CFR 73.2

defines a barrier as free from any openings that would lessen the integrity of the barrier and that the 96 square inch criterion was less restrictive than 10 CFR 73.2 and used primarily for NRC inspection purposes. The licensee indicated that the inspection performed by BECo after the first two openings were identified was not adequate inasmuch as it did not identify the two additional openings identified by the inspector. To prevent recurrence, discussions were held with security personnel, plant supervisors and construction personnel to emphasize security awareness and that fliers were passed out to contractor personnel for the same purpose. Mr. Martin questioned the adequacy of the corrective action already initiated and the lack of action on BECo's part to improve the inspection process. The licensee representatives stated that additional options were available, but hadn't yet been thoroughly considered.

Dr. Murley requested the licensee to submit in writing and within seven days the specific corrective actions which will be implemented to prevent recurrence of the problems discussed during the meeting. Dr. Murley stated that the licensee's submittal would be considered in determining the appropriate enforcement action. Mr. Harrington agreed to Dr. Murley's request.

3. Surveillance Testing Concerns

The inadequacies identified in inspection 50-293/85-21 were then discussed. The licensee indicated that failure to submit Failure and Malfunction Reports (F&MRs) on two occasions caused corrective actions to be delayed for two abnormal surveillance test findings. In both cases, this resulted in violations of Technical Specification requirements. The licensee also indicated that the F&MR reports are used to initiate assessments of events with potential safety significance and must be filled out within one hour after an abnormal test finding is noted.

The licensee indicated that personnel did not fully understand the purpose of the reports and that classroom training sessions on the F&MR program for all onsite groups were being developed. In the interim, all maintenance department personnel have been instructed on the importance of initiating F&MRs. The licensee plans to conduct a course on technical specification requirements for the Maintenance Department.

NRC Region I management acknowledged that the plans and actions presented appeared to adequately address NRC concerns.

4. Adequacy of Secondary Containment

The adequacy of secondary containment in light of marginal secondary containment leakage test results during March 1985 and recently noted secondary containment ventilation damper failures were discussed. The licensee indicated that no cause of the marginal leakage test had been identified and suggested that high wind conditions during the March 1985 test may have caused excessive building leakage. However, following the enforcement conference, the Resident Inspector reviewed the leakage test records and noted that winds were less

strong during the March 1985 test (6 mph) than during an October 1984 test (10 mph). The secondary containment leakage was considerably lower during the October test despite the higher wind speed. The licensee subsequently indicated that the wind speed effect discussed at the enforcement conference was speculation and not based on test data. The licensee further indicated that a review of older tests following the conference had indicated that wind speed and building leakage were not correlated.

The licensee indicated that maintenance during this cycle on secondary containment dampers had been reviewed and that only a small number of dampers had been found inoperable during surveillance tests. The licensee stated that a secondary containment leakage test would be conducted at the beginning of the next three to five day outage during this fuel cycle. Subsequently, such a test was run on September 1, 1985. It indicated that secondary containment leakage was still within acceptance criteria.

5. Other Topics

The licensee indicated that an ongoing shortage of licensed operators was causing the on-duty operators to routinely work large amounts of overtime. Corrective actions were discussed which should substantially increase the number of licensed operators on shift by 1987.

The licensee also indicated that most plant equipment should be environmentally qualified by the November 30, 1985 deadline.