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Follow-up Response to NRC 50.54(f) Letter Regarding Adequacy and Availability of Design  
Bases Information

This letter provides the preliminary scope of our further evaluation of the UFSAR as committed in our 50.54(f) response letter dated February 20, 1997. As discussed in the 50.54(f) response action (c), certain UFSAR sections were reviewed for consistency with the station as-built design and operational configuration. The sections reviewed were largely determined by the systems that were within the scope of the Maintenance Rule and whose performance is most important for avoiding the potential for core damage following an accident. Although discrepancies were discovered, none adversely affected equipment operability. The overall results, however, indicated further evaluation was warranted. As such, we committed to perform a more in-depth review in accordance with the revised NRC Enforcement Policy associated with departures from the UFSAR.

The revised enforcement policy provides incentives to encourage licensees to identify and correct problems which are not normally identified through current surveillance and quality assurance activities. Licensees must take comprehensive corrective actions and expand their reviews appropriately through a voluntary initiative including either a formal program or informal effort where issues are identified through a questioning attitude of employees.

Current Status

We are continuing to work within the revised policy guidelines in our UFSAR review effort. The effort has been expanded through the successful implementation of the enhanced problem identification and corrective action processes as described in our responses to actions (d) and (e) of the 50.54(i) letter, and the NRC 40500 inspection response. Most notably, questioning attitudes among the Pilgrim personnel have taken effect as a cultural norm through implementation of these enhanced processes. UFSAR and design bases issues are being

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identified at a lower threshold. Observations as a result of this lowered threshold have been captured in our corrective action program as problem reports. Issues to be addressed as part of the expanded UFSAR review scope include:

Problem Report Number 96.0311  
Modifications to the Trash Compaction Facility

Problem Report Number 96.0573  
Scram Discharge Volume Modification Negates Previous Design Commitment

Problem Report Number 96.9291 and 96.9296  
Uncertainty of Design Basis Values used in LOCA Analyses

Problem Report Number 96.9595  
High Energy Line Break Barrier Control

Problem Report Number 97.0426  
Numerous Minor UFSAR Discrepancies Discovered

Problem Report Number 97.1026  
Use of Incorrect Damping Values in the Seismic Analysis of Piping Systems

Problem Report Number 97.1361  
ECCS NPSH Licensing Basis

Problem Report Number 97.9133  
UFSAR Update not in Compliance with 50.71(e)

Problem Report Number 97.9383  
Discrepancies in Design Basis Temperatures Affecting EDG Operation

In addition, we included the UFSAR as an area to self-assess at the worker level on a periodic basis. The enhanced self-assessment process was described in detail in our response to action (d) of the 50.54(f) letter. The first such UFSAR self-assessment identified similarities to the type of generic UFSAR discrepancies observed by the NRC at other facilities, such as level of detail, outdated information, and information upkeep. For example, it was noted that the information content of the UFSAR has decreased with time. Some sections of the UFSAR are outdated (e.g., environmental/site demographics), and some sections are no longer relevant (e.g., pre-operational testing, startup data, comparison with other units, Bechtel QA). The outdated sections are viewed as historical and were left in the UFSAR for that reason as part of the original project scope when the UFSAR was first updated. Whereas, relevant information that might appropriately be considered for addition to the UFSAR has not been added. This includes references to the latest codes, standards, safety evaluations, commitments for new regulations, generic issues, or plant specific actions.

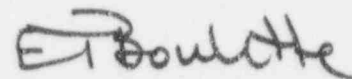
To address these issues, we have formed a team to perform root cause analyses of certain of the above referenced problem reports and review the results of the investigations and recommended corrective actions for the other problem reports. Other problem reports will also be reviewed for

UFSAR related issues not already identified. Implementation of programmatic solutions will carefully consider the ongoing NRC activities associated with SECY 97-36 "Millstone Lessons Learned Report, Part 2: Policy Issues".

Additional activities we plan to undertake include:

- By June 30, 1997, revise the schedule for updating the UFSAR to every 2 years as prescribed in 50.71(e). Changing from an annual update will provide a more effective use of resources involved in the updating process. The once per year frequency burdens the organization resources and has remained in place only in support of the plant design change process, which will be changed shortly as discussed below.
- By October 31, 1997, change the UFSAR revision and plant design change processes to sequence the finalized UFSAR pages earlier in the process. The UFSAR pages will be finalized at the same time that plant drawings and procedures are updated in preparation for operational turnover. The revised UFSAR pages will be included in the next UFSAR update.
- By March 31, 1998, complete a comprehensive review of the initial conditions, assumptions, and results represented in the transients and postulated design basis accidents of UFSAR Chapter 14 "Station Safety Analysis". Since this is the fundamental set of analyses demonstrating the ability of the plant to operate without undue hazard to the public health and safety, it is important that this chapter be reviewed in a more in-depth fashion than undertaken in our previous UFSAR review effort. Further reviews of additional chapters will be determined based on the Chapter 14 results.

We will continue to closely follow the NRC plans for revising the 50.59 process and for implementing short term lessons learned from Millstone, and will apply appropriate resources to the resolution of these efforts in a timely manner. Further scope definition and associated progress will be provided as additional courses of action are developed. Should you have any questions or concerns in the interim, please do not hesitate to contact Mr. J. D. Keyes at (508) 830-7942 of the Regulatory Affairs Department.



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