

BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

Ralph G. Bird
Senior Vice President — Nuclear

July 7, 1988
BECO Ltr. #88-103

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

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

Subject: Supplemental Response to NRC Inspection
Report No. 50-293/88-17

Dear Sir:

The attached information provides additional detail with respect to Maintenance staffing and performance and supplements our initial response to MRC Inspection 88-17 dated 6/25/88. The information is submitted in accordance with an agreement reached between Mr. Gallo and Mr. Highfill during a telephone conversation on July 1, 1988.

Please do not hesitate to contact me if there are questions or comments regarding the attached response.


R.G. Bird

PJH/dmc

Attachment

cc: Mr. William Russell
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Rd.
King of Prussia, PA 19406

Sr. Resident Inspector - Pilgrim Station

Standard BECo Distribution

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ATTACHMENT A

Boston Edison Company
Pilgrim Nuclear Power Station

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Supplemental Response to NRC Inspection Report No. 50-293/88-17

Staffing

The Maintenance organization, including supervisory and planning positions, is fully staffed with a combination of Boston Edison and contractor personnel. An aggressive process is in place to hire permanent personnel for those positions currently filled by contractors. Current projections show permanent positions will be filled with Boston Edison personnel by August 31, 1988. Our plan is to maintain the Maintenance Organization fully staffed (\pm 5 positions) utilizing contractors when necessary.

The existing Maintenance staff (both Boston Edison and contractors) is trained on the recent changes that were made to enhance the work control process. New personnel will be trained as appropriate on the process which is discussed in our initial response to Inspection 88-17.

To increase the attractiveness of jobs in Maintenance, specific actions have been taken:

- Physical working conditions have been improved as a result of the plant decontamination program. Fewer jobs require the use of cumbersome protective clothing to perform.
- Administrative workload on Maintenance supervisors has been reduced by addition of the System Engineering Division and implementation of the Maintenance Planning Division. Maintenance work controls have been upgraded providing more specific guidance to the individuals performing maintenance activities.
- Maintenance staff overtime has been reduced.
- The supervisor to craft ratio has been improved.
- Long term action to upgrade supervisory training has been initiated.

Specific performance goals in the Maintenance area have been established for restart and operation. The goals are based on industry guidance and are published/posted routinely to keep personnel informed of progress towards the goals.

Performance

In response to the results of Inspection 88-17, several actions have been taken to ensure adequacy of previously performed maintenance activities.

ATTACHMENT A
(Cont'd)

Supplemental Response to NRC Inspection Report No. 50-293/88-17

Boston Edison Company has reviewed the concerns identified by the Inspection Team regarding the sample of Maintenance Requests (MR) reviewed by the team during the Maintenance Inspection. These concerns are currently being assessed by BECo to establish the adequacy of previously performed maintenance activities by reviewing and compiling available documentation of the work that was performed by these MRs. Where documentation was not available, walkdowns were performed to ensure adequacy. To date, no rework has been identified. The documentation for one post work test could not be located. To address this item, the post work test was reperfomed with satisfactory results. The assessment of these concerns is expected to be completed in July 1988. The adequacy of previous work is further assured by the Quality Assurance and Quality Control Divisions oversight of work on safety related equipment.

In summary, appropriate steps have been taken to establish and maintain a qualified maintenance staff at Pilgrim Station. Preliminary results of our assessment indicate that maintenance activities performed prior to recent program improvements are adequate. Our conclusion is based on the assessment of historical maintenance records and walkdowns performed to date which resulted in no rework, coupled with the Quality Assurance Department oversight of previous activities.