



BOSTON EDISON
Executive Offices
800 Boylston Street
Boston, Massachusetts 02199

ATTACHMENT 1

Ralph G. Bird
Senior Vice President -- Nuclear

September 26, 1987
BECO Ltr. #87-155

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

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

Subject: Response to NRC Inspection Report 50-293/87-30
and Enforcement Conference of 9/9/87

Dear Sir:

Attached is Boston Edison Company's response to the apparent violations identified in the subject inspection report. This response is submitted as agreed to by Boston Edison and NRC Managers at the Enforcement Conference on September 9, 1987 at NRC Region 1 Offices in King of Prussia, Pennsylvania. Boston Edison has taken extensive actions to upgrade Security at Pilgrim and to respond to the apparent violations, and we believe that further enforcement action is not warranted.

Enclosure 1 provides Boston Edison's Response to the Apparent Violation on the Airlock Door. While there was a degraded vital area barrier as alleged in NRC's Inspection Report 50-293/87-30, Enclosure 2, which provides Boston Edison's assessment of the adequacy of guard response to vital area alarms, shows that the guard response met applicable regulatory requirements.

Enclosure 3 provides Boston Edison's Response to the Apparent Violation on the 22" Salt Service Water pipe. While there was a degraded vital area barrier and loss of intrusion detection as alleged in Inspection Report 50-293/87-30, Enclosure 3 also shows that, under the plant conditions existing at the time of the violation, the loss of two elements of access control would not have resulted in access to vital equipment.

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Based on the discussion at the Enforcement Conference, we believe that we have adequately responded to the incident of the misplaced keys. Therefore, we have not addressed that issue in this response.

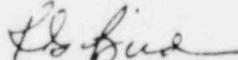
Enclosure 4 provides a summary of Boston Edison's Programmatic Improvements to the Pilgrim Nuclear Power Station Security Program which shows that, apart from the two apparent violations addressed herein, Boston Edison has undertaken extensive efforts to upgrade the management, organization, maintenance, and material condition of its security program. Positive results of these efforts are evident, and Boston Edison is committed to achieve further improvements.

Enclosure 5 provides Boston Edison's Assessment of the Apparent Violations, which shows that further enforcement action would not be warranted for the following reasons:

1. The corrective actions taken for both violations were timely and effective.
2. There is no significant link between the two apparent violations and there is no significant causal link between either of the two apparent violations and previous events at PNPS.
3. Since guard response for the Airlock Door event met regulatory requirements, a level IV violation is the appropriate severity category for the event. At the same time, Boston Edison recognizes that the response can and should be improved. Additional measures which could upgrade the response are under review.
4. Although the Salt Service Water event did indicate degradation of a barrier and loss of intrusion detection, no access to vital equipment would have occurred. In light of that fact, and the fact that the event was licensee identified and corrected, under 10 CFR Part 2, Appendix C, Section V.A.(1)-(5) a Notice of Violation should not be issued.
5. Boston Edison has already extensively upgraded performance in the security area. Our long term commitment to further improvement will continue. In light of those actions and commitments, Boston Edison does not believe that further enforcement action would serve a constructive regulatory purpose.
6. Since the apparent violations are properly characterized as Level IV and are not similar, no further enforcement action is warranted.

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Please contact me directly if you have any questions concerning our response.


R. G. Bird

- Enclosure 1 Response to Apparent Violation on Airlock Door
2 Assessment of Adequacy of Response to Vital Area Alarms
3 Response to Apparent Violation on 22" Salt Service Water Pipe
4 Summary of Programmatic Improvements to Pilgrim Nuclear Power Station Security Program
5 Assessment of Apparent Violations

cc: Mr. J. Taylor
Deputy Executive Director for Regional Operations
United States Nuclear Regulatory Commission
Washington, DC 20555

Mr. W. Russell
Regional Administrator, Region 1
United States Nuclear Regulatory Commission
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ENCLOSURES 1, 2, 3, 4 AND 5 TO LETTER DATED SEPTEMBER 26, 1987
CONTAIN SAFEGUARDS INFORMATION AND ARE BEING WITHHELD FROM
PUBLIC DISCLOSURE.