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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

April 11, 1986
BECO Ltr. #86-043

Mr. Edward C. Wenzinger, Chief
Projects Branch No. 3
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Subject: Response to Violation as Contained in NRC Inspection Report 86-01

Dear Mr. Wenzinger:

This letter is in response to the subject violation as contained in NRC Inspection 86-01, conducted by Dr. McBride of your office on January 1, 1986 to February 17, 1986 at Pilgrim Nuclear Power Station.

The subject violation and Boston Edison's response is enclosed as an attachment to this letter.

Regarding your concern of non-safety Control Room equipment not being well maintained and Control Room annunciators not being properly cleared or deactivated, Boston Edison management is currently evaluating this problem. Our evaluation will include a reassessment of Control Room equipment problems with a view towards improved problem identification and correction. The evaluation will also include a review of a violation in NRC Inspection Report 81-02 to determine whether a possible causal link exists. We will inform the resident inspector within (30) days of this letter's issue date as to what our conclusions are and what our subsequent action plan will be.

If you should have any further questions regarding these matters, please do not hesitate to contact me.

Very truly yours,

W. D. Harrington
W. D. Harrington

Attachment

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PDR ADOCK 05000293
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ATTACHMENT

Violation

Technical Specification 6.8.A requires that procedures be implemented that meet or exceed the requirements of regulatory Guide 1.33. Regulatory Guide 1.33, Appendix A includes procedures for reactor trip recovery and log entries.

Procedure 1.3.37, "Post Trip Review", requires that data be collected and assembled in a Post Trip Review (PTR) package in order to reconstruct a reactor trip, assess the response of systems, and identify the root cause of the event. This review is a part of recovery from a reactor trip. Copies of recorder charts for certain control room parameters, including reactor feedwater flow and reactor water level, are required by the procedure to be included in the PTR package. The procedure requires that recorder chart speed be noted on the recorder charts.

Procedure 2.3.1, "General Action (Alarm Procedures)", requires that disabled control room annunciators be entered in the Disabled Annunciator Alarm Log.

Contrary to the above:

On January 6, 1986, no recorder charts were included in PTR No. 86-01. In addition, on January 16, 1986, PTR no. 86-02 did not include recorder chart speeds.

Between January 2, 1986 and February 2, 1986, three control room annunciators were disabled and appropriate log entries were not made in the Disabled Annunciator Log.

Boston Edison Response

Regarding the missing recorder charts issue, the two incidents of data and chart omission were caused by an error in judgement on the part of one individual. As corrective action to correct the condition, the individual involved has been made aware of the need to strictly adhere to the procedural requirements.

As corrective action to preclude recurrence, other individuals involved in the preparation of the subject reviews have been verbally advised to the procedural requirements. As additional action, an instructional memorandum was issued to the above group, reinforcing the need for procedural adherence.

Full compliance (for this part of the violation) was achieved on April 8, 1986, the date upon which personnel were reminded (via memo) of the need for procedural adherence.

Regarding the failure to make required annunciator log entries, the individual involved has been re-instructed to the requirements of the procedure. As further corrective action to correct the condition, the appropriate entries have been made in the annunciator log.

As corrective action to preclude recurrence, an instructional memo was issued to Operations Group personnel highlighting the subject violation and emphasizing the importance of annunciator log maintenance.

Full compliance (for this part of the violation) was achieved on April 8, 1986, the date upon which the subject log was audited to ensure it's accuracy.