

FEB 18 1987

Docket No. 50-293

Boston Edison Company M/C Nuclear  
ATTN: Mr. James M. Lydon  
Chief Operating Officer  
800 Boylston Street  
Boston, Massachusetts 02199

Gentlemen:

Subject: Inspection No. 50-293/86-36

This refers to your letter dated January 29, 1987, in response to our letter dated December 30, 1986.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:  
Clifford J. Anderson



Stewart D. Ebnetter, Director  
Division of Reactor Safety

cc w/encl:

L. Oxsen, Vice President, Nuclear Operations  
A. E. Pedersen, Station Manager  
Paul Levy, Chairman, Department of Public Utilities  
Edward R. MacCormack, Senior Regulatory Affairs and Program Engineer  
Chairman, Board of Selectmen  
Plymouth Civil Defense Director  
J. D. Keyes  
The Honorable E. J. Markey  
Senator Edward P. Kirby  
The Honorable Peter V. Forman  
Sharon Pollard  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
Commonwealth of Massachusetts (2)

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02/13/87

bcc w/encl:  
Region I Docket Room (with concurrences)  
Management Assistant, DRMA (w/o encl)  
T. Murley, RI  
Section Chief, DRP  
W. Raymond, SRI, Vermont Yankee  
T. Shedlosky, SRI, Millstone 1&2  
H. Eichenholz, SRI, Yankee  
P. Leech, LPM, NRR  
PAO (2) SALP Reports Only  
Robert J. Bores, DRSS

*ca fm*  
RI:DRS  
Krasopoulos/ca  
2/17/87

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RI:DRS  
Anderson  
2/17/87

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RI:DRS  
Durr  
2/17/87

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RL PILGRIM 86-36 - 0002.0.0  
02/13/87



**BOSTON EDISON**

Executive Offices  
800 Boylston Street  
Boston, Massachusetts 02199

**James M. Lydon**  
Chief Operating Officer

January 29, 1987  
BECo Ltr. #87-017

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

Mr. William V. Johnston, Deputy Director  
Division of Reactor Safety  
USNRC - Region 1  
631 Park Avenue  
King of Prussia, PA 19406

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

Subject: Response to NRC Inspection Report No. 50-293/86-36

Dear Mr. Johnston:

Attached please find Boston Edison Company's response to four significant deficiencies identified in the subject inspection report. Two of the deficiencies, classified as violations, involved inadequate fire watches and inadequate participation by fire brigade members in required training. The two violations are addressed in attachment 1 of this letter.

Two other deficiencies identified in the inspection report involved the backlog of maintenance work on fire protection equipment and a resultant reliance on fire watches as compensation for degraded fire equipment. These two deficiencies are addressed in attachment 2.

Prior to issuance of this inspection report Boston Edison Company had recognized that additional management attention was necessary in the fire protection area. Accordingly the fire protection function was separated from the Resource Protection and Control Group which was previously responsible for fire protection and several other areas. This reorganization focuses specific management responsibility on the fire protection area by assignment of a new group leader dedicated solely to the control of this program.

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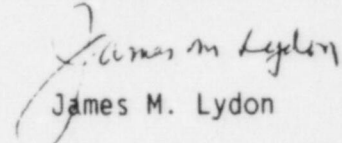


Mr. William V. Johnston  
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Establishment of the new group leader combined with the other corrective actions stated in this response are representative of the actions Boston Edison has taken to resolve the four significant deficiencies identified in Inspection Report 86-36. The corrective actions taken and stated herein were also discussed, together with other fire protection issues, at a meeting with Senior NRC Regional Management on January 20, 1987 at NRC Region 1 offices.

Please do not hesitate to contact me directly should you have any question regarding these matters.

Very truly yours,

  
James M. Lydon

PJH/1a

Attachment: 1. Boston Edison Company Response to Violations  
2. Boston Edison Company Response to Significant Deficiencies

xc: Dr. M. McBride

BOSTON EDISON COMPANY RESPONSE TO VIOLATIONS

Boston Edison Company  
Pilgrim Nuclear Power Station

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

NRC Inspection Report 50-293/86-36 identified two violations and two significant deficiencies in the area of fire protection. Those violations and the BECo response are as follows:

NRC Violation

- A. Pilgrim Nuclear Power Station Operating License Number DPR-35, Section 3.F, Fire Protection, requires the licensee to implement the administrative controls specified in Section 6 of the NRC's Fire Protection Safety Evaluation (SE), dated December 21, 1978. Section 6 of the NRC Fire Protection SE states that the fire brigade training program shall meet the requirements presented in NRC guidance document "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls and Quality Assurance". The requirements in part are "...Instruction will be provided to all fire brigade members and fire brigade leaders at regularly planned meetings held every 3 months...".

Contrary to the above, as of October 21, 1986 at least thirty (30) members of the brigade had not received the required classroom instruction in that nine (9) members of the brigade had not participated in two quarterly sessions of required classroom instruction and twenty-one (21) members had not participated in one quarterly training session.

Boston Edison Response

Boston Edison concurs with the violation as stated. As immediate corrective action the nine members of the fire brigade who had not participated in two classroom training sessions were immediately removed from active brigade status. The remaining twenty-one brigade members had been allowed to remain as active brigade members in accordance with the Boston Edison Training Manual. The Training Manual previously allowed brigade members to miss one quarter of training and remain active provided that the missed training is completed in the next consecutive quarter. Subsequently the twenty-one members in question were either trained or removed from active fire brigade status by January 2, 1987 which is the date of full compliance.

Analysis of this violation identified two contributing causes:

1. The Boston Edison Training Manual did not accurately reflect NRC regulatory guidance with respect to quarterly fire brigade training. Specifically the Training Manual allowed a brigade member to miss training in one quarter and remain active provided that the required training is completed in the next quarter. As corrective action the Training Manual Section 4.2.1.1.B has been revised to read, "Any individual who does not complete his quarterly training obligation, will be removed from the active fire brigade list, until the training is made up".

BOSTON EDISON COMPANY RESPONSE TO VIOLATIONS

2. The method of tracking those persons qualified for active brigade duty was fragmented. As corrective action Boston Edison has centralized the process for issuance of an active fire brigade roster. The Fire Protection Group Leader is now responsible for this activity as supported by the Training Section.

Long term corrective action includes the planned addition of a full time Boston Edison fire brigade training instructor who ultimately will be responsible for brigade training and issuance of the active fire brigade roster. Furthermore, to ensure that there are no other areas where brigade training requirements do not meet regulatory guidance, a regulatory requirements analysis will be performed. It is estimated that it will take approximately two (2) months to obtain additional resources and complete this analysis.

NRC Violation

- B. The Pilgrim Technical Specifications Section 6.8.D requires that written procedures to implement the Fire Protection Program shall be established, implemented and maintained. One Fire Protection Program Procedure is 8.B.14 Fire Watch, which requires that fire watches must inspect hourly the plant areas found with inoperable fire protection equipment or degraded fire barriers.

Contrary to the above, as of October 21, 1986, the fire watches assigned to patrol the vital MG Set room had not entered the room to perform the hourly patrol from at least 8 AM to 11 AM that day. This was ascertained by an examination of the electronic keycard entry logs for this room. Also, the fire watch assigned to patrol the MG set room did not perform the required room surveillance. The inspector observed that the 4 PM fire watch entered the room, signed the log and left.

Boston Edison Response

Boston Edison concurs with the violation as stated. Immediate corrective action with regard to the fire watch inadequacies was to verbally counsel the fire watch personnel involved. Subsequently a memorandum was issued, as noted in the inspection report, reiterating the duties and responsibilities of fire watch personnel.

With regard to the vital MG set room the fire watch had previously performed the inspection by looking into the room through an open air damper. To preclude recurrence the signoff sheet for the vital MG set room was moved into the room from the hallway outside to ensure that the fire watch would enter the room during the hourly patrol.

Other corrective steps which have been taken since this violation include increased field supervision by contractor fire watch personnel and unannounced field verification by Boston Edison management personnel to ensure that fire watch duties are being performed as required. These actions combined with revised and more thorough fire watch training should preclude recurrence of a similar violation. Full compliance was achieved on October 21, 1986, the date when the persons involved were counseled.



BOSTON EDISON COMPANY RESPONSE TO  
SIGNIFICANT DEFICIENCIES IDENTIFIED IN THE  
COVER LETTER TRANSMITTING INSPECTION 50-293/86-36

Boston Edison Company  
Pilgrim Nuclear Power Station

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

The cover letter transmitting Inspection Report 50-293/86-36 identified four significant deficiencies in the fire protection area. Two of the deficiencies, fire watches not performing their assigned duties and inadequate participation by fire brigade members in required training, are addressed in attachment 1 of this letter. The other two deficiencies and the corresponding Boston Edison response follow:

NRC "...a significant backlog of maintenance work to be performed on the fire protection equipment."

Boston Edison Response

Boston Edison recognizes that resolution of outstanding maintenance on the fire system is a key factor in ensuring a successful fire protection program. As a result the following actions have been taken:

- ° Routine (usually weekly) meetings between fire protection and maintenance planning personnel are conducted to set priority on Maintenance Requests (MR's) to be worked during the next week.
- ° The maintenance work force has been supplemented with contractor personnel to address backlog work items including fire protection MR's.
- ° A fire protection system status board has been established in the Control Room and the Fire Protection office on a trial basis. The board which is updated daily provides system status at a glance and is utilized in establishing priority of maintenance work.
- ° Routine plotting and monitoring of open fire system MR's is being performed by the Fire Protection Group Leader to ensure that resources are properly applied to eliminate the open fire protection MR's.

Since Inspection 86-36 was performed in October 1986, the following progress has been made in reducing the number of open MR's.

- ° Open fire protection MR's reduced from 300 to 244.
- ° Of the 244 open MR's:
  - 25 are the result of planned modification work
  - 78 are associated with potentially degraded barriers and seals which are being addressed by the fire barrier upgrade program under the Appendix R project
  - 141 are associated with general maintenance of equipment, the majority of which do not directly affect system operability

BOSTON EDISON COMPANY RESPONSE TO  
SIGNIFICANT DEFICIENCIES IDENTIFIED IN THE  
COVER LETTER TRANSMITTING INSPECTION 50-293/86-36

The other significant deficiency identified in the cover letter transmitting Inspection Report 86-36 is listed below:

NRC: "a substantial reliance on fire watches as compensation for degraded fire protection equipment."

Boston Edison Response:

Boston Edison concurs that a substantial number of compensatory fire watches are in place at Pilgrim Station as the result of degraded or potentially degraded fire protection equipment and barriers.

Efforts to reduce the number of compensatory watches include the following:

- ° Established a weekly fire watch management report which monitors and identifies the ownership of problem resolution associated with each fire watch. This report is utilized by the Fire Protection Group Leader to assist in the elimination of fire watches. A copy of this report will be sent to the Sr. Resident Inspector for information.
- ° Continue to reduce the number of open fire system MR's as previously discussed in this attachment.
- ° Continue to assign priority to the open fire system MR's requiring compensatory watches.
- ° Continue to address the fire barrier penetrations issue as discussed with senior NRC managers during the January 20, 1987 meeting at Region 1 offices.

Currently there are 110 fire watch postings of which:

- 15 involve planned refueling outage work
- 25 involve outstanding fire system MR's other than barriers and seals
- 70 involve fire barrier/seals

These fire watch activities are presently fulfilled by 5 roving patrols and 4 continuous watches each shift. There has been a reduction of 1 roving patrol and 4 continuous patrols since January 8, 1987 due to the efforts listed above.