BOSTON EDISON

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James M. Lydon
Chief Operating Officer

September 30 , 1986
BECo Ltr. #86-154

Mr. Stewart D. Ebneter, Director
Division of Reactor Safety
U.S. Nuclear Regulatory Commission
Region I - 631 Park Avenue
King of Prussia, PA 19406

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

SUBJECT: Status of Activities on NRC INC. #81-22-01

References: (A) Combined NRC Inspections 81-18 and 81-22
(B) BECo Letter #85-142, Dated August 7, 1985

Dear Mr. Ebneter:

This letter is providing a revised schedule of activities (Attachment #1) related to the resolution of the Item of Noncompliance #81-22-01 and is a followup to a telephone conversation held on 9/25/86 between Boston Edison staff personnel and Mr. J. Durr of your staff. This item related to a maintenance request requiring the D4 breaker (No. 3) to be opened which deenergized power to panel No. C930. This resulted in a loss of redundancy for the high temperature and high steam flow rate auto isolation function, and a loss of trip capability for the RCIC low pressure auto isolation function.

In response to this item BECo developed the E203 walkdown project with a goal to revise PNPS procedures so that they clearly identify the affects of opening breakers on various buses supplying equipment throughout PNPS. Substantial progress has been made in complying with the project commitments and schedules listed below, which were established and provided in BECo Letter #85-142 (Reference B).

IE01

Activity Description	Scheduled Completion Date	Date Completed
Revise procedures for D4, D5, D6, Y1, Y2 and D19 to more clearly indicate equipment affected by the individual breakers.	12/31/85	12/31/85
Complete E-203 walkdowns and issue Discrepancy packages to the Nuclear Engineering Dept. for disposition.	7/31/86	4/11/86
Revise all affected procedures to include:		
1) Applicable Technical Specification	9/30/86	12/31/85
2) Walkdown-Observed Configuration Changes	9/30/86	10/31/86 EST.
3) Component Details	9/30/86	1/31/87 EST.

Phase I of the project was completed by the scheduled date of 12/31/85. This involved the initial revision of procedures for Panels D4, D5, D6, D19, Y1 and Y2 to clearly indicate equipment affected by the individual breakers, also included were references to the applicable Technical Specifications. The second phase of the project was scheduled to be completed by 7/31/86. The walkdown tasks were accomplished and the circuit discrepancies documented by 4/11/86. The purpose of the walkdowns was to verify that power cables entering a panel terminate at the correct terminal block points, as shown on applicable external wiring drawings, and that the cable scheme number is correct. Also an internal wiring verification of the power distribution within the panel was conducted which consisted of point-to-point checks as delineated by the latest applicable internal wiring drawing. This provided a comparison of the number of internal and external wires actually connected at a given terminal point with the number shown on the applicable drawings.

The final phase of the project which involves revising the affected procedures to include walkdown configuration changes and component detail, based on the walkdowns and circuit analysis, is behind schedule. The delay to this aspect of the project is a result of the Boston Edison Union personnel work stopage, the temporary reallocation of resources to the Mode Switch Analysis Project and the quantity and complexity of discrepancies identified during the circuit walkdowns. The amount and variety of discrepancies found during the walkdown portion of the project far exceed the percentage of discrepancies found during the original walkdowns, upon which the anticipated workload and schedule was based.

Many of the E203 project discrepancies deal with fused equipment. The Engineering Department has been performing a detailed fuse coordination study for station equipment and these discrepancies have been incorporated into that study for resolution. The Engineering Department evaluations of the remaining E203 project discrepancies are continuing in a thorough, controlled and time intensive manner.

In order to include the results of the electrical fuse coordination study which at this time is scheduled for completion by December 15, 1986 and to include the resolutions of discrepancies identified during walkdowns which plan to be completed by Oct. 31, 1986, the revised date for completion of the final phase of this project has been rescheduled to January 31, 1987.

The documented discrepancies will have been evaluated by Engineering at that time. Discrepancies that raise concerns to Engineering and require corrective maintenance or modifications will be resolved through the BECo Corrective Action Program (e.g., Potential Condition Adverse to Quality Report, Plant Design Change or Field Revision Notice). The procedures will be updated again in the future as required to maintain the latest information via the corrective action program.

It should be noted that engineering evaluations, completed to date, have detected no significant conditions adverse to quality. A majority of the cases have been evaluated to be electrically equivalent, a clerical problem or not a true discrepancy but a possible misinterpretation of the drawings. However, if a significant condition adverse to quality is discovered through engineering evaluation, it will be resolved prior to start-up or a justification for operation will be prepared.

Should you have any further questions concerning this matter, please do not hesitate to contact me.

Very truly yours,

James M Lydon

James M. Lydon

JQ/la

Attachment 1. E203 Project Planning Schedule

Attachment 1

PROJECT ONLINE
PLOT ONLINE
RUN DATE 30SEP86
START 18DEC84
FINISH 29FEB88
DATA DATE 23SEP86

E203 PROJECT
BOSTON EDISON - PROJECT CONTROL GRP.
P L A N N I N G S C H E D U L E
SORT E START ICODES

MODE C/F
INTERVAL: 1 MONTH(S)

PROJECT/2 84B1
BAR CHART GRAPHICS
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