



**Boston Edison**

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Vice President Nuclear Operations  
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August 18, 1997  
BECo Ltr. 2.97. 084

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

License DPR-35  
Docket 50-293

SUBJECT: REPLY TO NOTICE OF VIOLATION (REFERENCE NRC INSPECTION REPORT NO. 50-293/97-06)

Enclosed is Boston Edison Company's reply to the Notice of Violation contained in the subject inspection report.

The following commitments are made in this letter:

- Prior to the present class of license candidates beginning their on-shift training phase, additional guidance will be incorporated into the license candidate shift qualification book. This guidance will specify that continuous, significant control manipulation by a common mechanism (e.g., recirculation flow or control rod movement) will count as a single significant manipulation, regardless of the size of the overall plant power change. This action will be completed by January 1, 1998.
- A requirement for specific review of each license candidate's significant control manipulations by training department personnel will also be added to the candidate shift qualification book prior to the present class of license candidates beginning the on-shift phase of their training. This action will be completed by January 1, 1998.

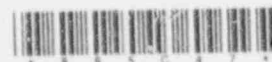
Please do not hesitate to contact me if there are any questions regarding the enclosed reply.

L. J. Olivier

RLC/dmc/vio97-06

Enclosure 1: Reply to Notice of Violation

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Pilgrim Nuclear Power Station

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Enclosure 1

Reply to Notice of Violation

During the initial licensing examination conducted by the NRC the week of May 5 - 9, 1997, the lead examiner identified some of the reactivity manipulations performed by our applicants may not have satisfied the NRC's expectations. This resulted in the following violation of NRC requirements (VIO 50-293/97-06-01):

**NOTICE OF VIOLATION**

"10 CFR 55.31(a)(5) requires, in part, that applicants for operator licenses must have performed five significant control manipulations on the plant that affects reactivity or power level.

Contrary to the above, as identified on May 5, 1997, two senior reactor operator applications, dated April 18, 1997, and submitted to the NRC, had documented five manipulations based on credit taken for multiple manipulations due to the extent of the power change when one manipulation should have been credited. When multiple manipulations due to extended power changes were removed, one applicant had two significant control manipulations, and the other applicant had three significant control manipulations.

This is a severity level IV violation (Supplement VII)"

**REASON FOR THE VIOLATION**

An incorrect assessment of conditions substantiating a license candidate's required reactivity manipulations resulted in this violation. The factors that led to this incorrect assessment are discussed in detail in the following paragraph.

An interpretation of what constituted a "significant control manipulation" was based on reviews of NUREG-1262, "Answers to Questions at Public Meeting Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operator Licenses", Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants", 10 CFR 55.59, "Requalification", and 10 CFR 55.31(a)(5). Following this review, we established an "in-house" listing of examples in the candidate shift qualification book. The listing would provide examples that would satisfy the requirement for a single reactivity manipulation for licensing purposes; this list of examples does not, however, provide limiting conditions describing how the manipulations are to be conducted or counted.

**CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED**

To ensure the license applicants in question had met the NRC's minimum requirement for reactivity manipulations, those two candidates performed additional reactivity manipulations while the NRC was evaluating the validity of the challenged manipulations. Following the satisfactory performance of two additional reactivity manipulations for one of the license candidates and three additional reactivity manipulations for the other license candidate, updated license applications for those two candidates

were submitted to the NRC on June 16, 1997 (reference BECo letter 2.97.062). The identified violation was entered into our corrective action process by the generation of Problem Report (PR) 97.2554.

#### **CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS**

Prior to the present class of license candidates beginning their on-shift training phase, additional guidance will be incorporated into the license candidate shift qualification book. This guidance will specify that continuous, significant control manipulation by a common mechanism (e.g., recirculation flow or control rod movement) will count as a single significant manipulation, regardless of the size of the overall plant power change.

A requirement for specific review of each license candidate's significant control manipulations by training department personnel will also be added to the candidate shift qualification book prior to the present class of license candidates beginning the on-shift phase of their training.

These actions will be completed by January 1, 1998.

#### **DATE WHEN FULL COMPLIANCE WAS ACHIEVED**

Full compliance was achieved on June 7, 1997, when all required significant reactivity manipulations had been completed for both candidates. Following completion of the last significant reactivity manipulation, updated license applications for those two candidates were submitted to the NRC.