

November 13, 1987

Docket No.: 50-293

Boston Edison Company
ATTN: Mr. Ralph G. Bird
Senior Vice President - Nuclear
800 Boylston Street
Boston, Massachusetts 02199

Dear Mr. Bird:

SUBJECT: NUREG-0737 ITEM I.C.6 VERIFYING CORRECT PERFORMANCE OF
OPERATING ACTIVITIES (TAC NO. 47313)

- Ref.: (1) BECo Letter 81-44 Merritt to Vassallo dated February 27, 1981.
(2) NRC Letter Vassallo to Morris dated December 20, 1982.
(3) BECo Letter 83-53 Harrington to Vassallo dated February 15, 1983.
(4) BECo Letter 83-233 Harrington to Vassallo dated September 2, 1983.
(5) NRC Letter Vassallo to Harrington dated June 14, 1984.
(6) BECo Letter 84-114 Harrington to Vassallo dated July 27, 1984.

This provides the staff evaluation of BECo actions to implement NUREG-0737 Item I.C.6, Verifying Correct Performance of Operating Activities. Based on our reviews we consider this item closed.

In reference 1 BECo committed to meet the requirements of NUREG-0737 Item I.C.6. Reference 2 identified differences between the NRC position on the subject item and the Pilgrim Station Procedures. Reference 3 stated that the station policy should conform to I.C.6 considering ALARA and personnel resource requirements, and that justification would be provided for any deviation. Reference 4 informed the NRC that Nuclear Operations Procedure (NOP) 8301 titled "Conduct of Operations" incorporating I.C.6 policy was issued June 17, 1983. Reference 5 requested additional information on personnel qualifications for tag hanging and on verification. Reference 6 responded in general to the questions in reference 5 and enclosed the following:

- (1) Form O-1, PNPS Operations Training Group - General Indoctrination (This is an employee qualification card listing procedures and other subjects and providing space for signatures of trainers).
- (2) Procedure 1.4.5, Rev 15, PNPS Tagging Procedure dtd 5/30/84.
- (3) Procedure 1.5.3, maintenance Requests, Rev 16, dtd 3/4/83.

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(4) Procedure 1.3.34, Conduct of Operations, Rev 4, dtd 5/31/83.

(5) Procedure 1.3.36, Rev 0, Measurement and Test Equipment, dtd 10/20/83.

(6) Procedure 1.3.37, Rev 0, Post Trip Reviews, dtd 2/28/84.

Reference 6 also committed to changes in procedures 1.45 and 1.3.34 to address the requirement for double verification.

Four inspections addressing NUREG-0737 Item I.C.6 were conducted in 1985 and 1986 to gain more specific information and to follow up on corrective actions. They are reported in inspection report numbers 50-293/85-03, 50-293/85-28, 50-293/86-25 and 50-293-37. In addition, in conjunction with an NRR visit to the site on August 20, 1987, evidence of training and qualifications for tag hanging was examined in the following:

(1) Procedure 1.45, Rev 19, PNPS Tag Hanging.

(2) O-NL-04-02-02, On-The-Job Performance Guide - Non-Licensed Nuclear Plant Operator Tagging (Documents the ability of the student to perform tasks required for a Non-Licensed Nuclear Plant Operator to protective tag systems)

(3) Form O-2A, Rev 5, NLNPO Initial Program Qualification Card.

As discussed in the enclosed SER, the reviews of the BECO documents referenced or noted above, and the inspection reports and your responses to them have led us to conclude that you have taken the actions necessary to achieve the objectives of NUREG-0737 item I.C.6. Therefore, we consider this item resolved for the Pilgrim Nuclear Power Station.

Sincerely,

Richard H. Wessman, Senior Project Manager
Project Directorate I-3
Division of Reactor Projects I/II

Enclosure:
As Stated

cc: see next page

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