

NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20655

September 24, 1987

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The Honorable William B. Golden Massachusetts State Senate Boston, Massachusetts 02133

Re: Docket No. 50-293 (2.206)

Dear Senator Golden:

This is to inform you that the time provided by NRC regulations within which the Commission may act to review the Director's Decision (DD-87-14) in this docket has expired. The Commission has declined any review. Accordingly, the decision became final agency action on September 15, 1987.

Sincerely,

Samuel J. Chilk Secretary of the Commission

cu: Service List

W. Lerbrus

C. Conklin MGM:

Piloria Station Annual Exercise Performance Scamary ubit

eckoround.

ligrim Station conducted a portial participation exercise from 6800 to 1400 in December 5, 1787. The exercise commenced with a declaration of Uniquel vent due to a contaminated injured man, on Alert due to a stuck open SRV, and General Emergency due to a LBCA leading to core uncovery combined with love f rafety equipment.

erformance:

he licensee quickly and correctly recognized and classified accident onditions. Protective action recommendations were conservative and timely. taff augmentation and facility activation was timely. Several weaknesses ore identified. These included: procedural problems with initial otification message forms; several key positions in the ERD do not have ufficient depth; discrepancies between dose assessment models; and poor ommand and control in the TSC. Overall performance indicated that the icenses would have performed in a marner to protect the health and safety of he public in the event of an accident. - Massachusette

tate/Local Fericemance:

here was no local participation in the exercise. There was a Commonwealth The did not observe this exercise. participated

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DEC 18 '87 13:43 NRC KING OF PRUSSIA P02

TELEPHONE REPORT

Date: __ 0 # C # 0 D # C _ 1 Z . 198 Z Time: __ 4145 _ Q . 0 .

Fecility: Filerim Nuclear_Comer_Station | Dorbet -_ 50:293

Brief Subject: Pilgrim Restart Hearing By Full Senate
Committee

Description of Occurrence:

A staffer from Senator Kennedy's Boston Office (Kathy Anderson) called the Region I office at 4:45 pm and reported that the Senate LABOR AND HUMAN RESOURCES COMMITTEE will hold a hearing on January 7,1988, in the Plymouth, Massachusetts area on the public health impact of the proposed restart of the Pilgrim station.

She indicated that the 4 issues the committee would be looking into were:

- . The progress on improving evacuation plans
- What is going on at this time with respect to an NRC decision on restart
- . Mun mill EEMU. . tindings so stdpsseed
- Why has the NRC not held adjudicatory hearings on the restart as requested

Their list of proposed attendees was reported to include:

- A panel of local residents
- A panel of public interest groups
- A panel of representatives from departments of the Commonwealth of Massachusetts
- The NRC
- FEMA
- Boston Edison Company

She also indicated the desire to have working level staff meetings with NRC during the week after Christmas, in order to prepare for the hearings. She also asked who from the NRC would be the most probable people to participate in the hearing and the working level meeting, and where would be a good place to hold the working meeting.

DEC 18 '87 13:43 NRC KING OF PRUSSIA POS

She indicated that a time and place for the hearing had not yet been determined, but would be announced at a later date.

She was recontacted and advised that she should contact the Office of Congress: 3000 Affairs to arrange participation of the NRC in this event.

Notification received , to T. Doorflein

BARNEY FRANK

COMMITTEES
GOVERNMENT OPERATIONS
CHAIRMAN
ENPLOYMENT AND HOUSING
BANKING, FINANCE, AND
URBAN AFFAIRS
JUDICIARY
AGING

Congress of the United States House of Kepresentatives Washington, D.C.

July 1, 1986

WASHINGTON OFFICE 1030 LONGWORTH BUILDING WASHINGTON, D.C. 20515 12021 225-5931

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8 NORTH MAIN STREET ATTLEBORO, MASSAL ALSETTS 02703 (617) 226-4723 W

Mr. Lando Zech Chairman Nuclear Regulatory Commission 1717 H Street, N.W. Washington, MA 20555

Dear Mr. Zech:

I would appreciate it if you would send me detailed information regarding your reports of radioactive emissions at the Pilgrim Nuclear Power Plant in Plymouth, Massachusetts.

Please list all radioactive releases that are normally allowed by your regulations, and also list separately those releases that exceeded the technical specifications for the plant.

Thank you for your ettention to this matter.

BARNET PRANK

BF/rwn

co: Representative Edward Markey

8608210284 (p)



UNITED STATES NUCLEAR REGULATORY COMMISSION REGION 1 631 PARK AVENUE

KING OF PRUSSIA, PENNSYLVANIA 19406

AUG 2 0 1986

Docket No. 50-293

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

Gentlemen:

Subject: Management Meeting (50-293/86-30) Held on July 30, 1986

This letter transmits a report of the management meeting held in the Region I Office, King of Prussia, Pennsylvania on July 30, 1986 to discuss Boston Edison Company (BECo) corrective action and improvement programs, including plant status, SALP issues, Mark I containment enhancements and other issues.

We believe the discussions were frank and constructive.

Thank you for your cooperation.

Sincerely,

Enclosure: Management Meeting No. 50-293/86-30

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)

8742196673 (299)

bcc w/encl: Region I Docket Room (with concurrences) Management Assistant, DRMA (w/o encl) 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

U. S. NUCLEAR REGULATORY COMMISSION

REGION I

Meeting No.

50-293/86-30

Docket No.

50-293

License No.

DPR-35

Licensee:

Boston Edison Company M/C Nuclear

800 Boylston Street

Boston, Massachusetts

Facility Name: Pilgrim Nuclear Power Station

Meeting At: USNRC, Region I, King of Prussia, PA

Meeting Conducted: July 30, 1986

Prepared by:

Bride, Senior Resident Inspector

Approved by:

Chief, Projects Section

Meeting Summary: A management meeting was held at NRC Region I on July 30, 1986 to discuss plant status, SALP improvement status, overtime control, startup checklist, Mark I Containment enhancement and other issues. The meeting lasted about two hours. Members of the news media attended the meeting.

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DETAILS

1.0 Purpose

The management conference was held at the request of NRC Region I. The licensee was asked to discuss recent program improvements and other topics of interest at the plant. The licensee announced prior to the meeting, that the current outage would be extended until early 1987.

2.0 Meeting Summary

Dr. T. Murley, NRC Region I Administrator, opened the meeting with a brief discussion of recent regulatory actions, including the Augmented Inspection Team, Confirmatory Action Letter (CAL) 86-10, and the agreement to seek Region I approval prior to starting the plant. Mr. A. L. Oxsen, Vice President of Nuclear Operations, opened Boston Edison's presentation by discussing recent licensee program changes, including a management realignment under an Executive Vice President and the decision to enter into refueling outage number seven. Mr. Oxsen indicated that Boston Edison will complete fire protection modifications required by 10 CFR 50, Appendix R during this outage. Boston Edison also plans to work on further improvements in management control processes and implement certain Mark I containment enhancements during the outage.

a. Plant Status

Current outage work was discussed, including inspections of the residual heat removal (RHR) pump impeller wear rings and ongoing containment leakage testing. No visual indications have been detected in the wear rings of the two RHR pumps that had been disassembled. The remaining two RHR pumps will be inspected in the near future. The licensee discussed bearing wear that had been detected in one of the pump motors and indicated that the pump impeller wear rings will be tested for hardness and dye penetrant checked.

The status of local leak rate testing (LLRT) was reviewed. Problems with the leakage test procedure for the feedwater check valves that may have contributed to a falsely high as-found leakage rate were discussed. The licensee stated that the LLRT procedure would be modified prior to as-left testing. The licensee's plans for integrated Teakage testing were also discussed.

b. SALP Improvement Status

Improvements in management programs that relate to SALP-identified weaknesses were discussed, including the work control process at the station, the development of performance indicators, communication of problems within the licensee organization, and staff accountability. The licensee stated that full-time planners would be assigned to

each management section head, to help track and prioritize section work. Periodic morning meetings between the Plant Manager, QA, and the section heads were also described.

The licensee's preparations for this year's emergency planning exercise were discussed. The licensee indicated that several practice drills were planned.

c. Overtime Control During Startup

The projected number of licensed operators available for the plant start up in 1987 were discussed. The licensee indicated that five shifts will be manned and that an additional senior licensed operator will be added to each watch. Boston Edison agreed to discuss planned overtime controls during the next plant startup in more detail during the next NRC management meeting.

d. Startup Check List

The preparation of a detailed check list of items that should be completed prior to a plant startup was discussed. The licensee indicated that the startup will last several weeks and will contain hold points at particular power levels. Regional management indicated that the checklist and the startup itself will be reviewed in considerable detail and that Regional Administrative approval will be required prior to proceding past certain critical hold points to be identified later. The Regional Administrator indicated that he will not grant approval for a restart until after the NRC has reviewed the licensee's startup plan.

e. Mark I Containment Enhancements

The licensee discussed possible improvements for the Mark I containment at Pilgrim. The changes will probably be made to enhance such features as containment oxygen control, containment venting, and containment spray. The need to consider these changes carefully and avoid inadvertently degrading other aspects of containment was emphasized by regional management. The licensee agreed and indicated that the enhancements would receive a thorough review. The licensee also indicated that they would be working closely with Vermont Yankee, another plant that is reviewing the Mark I containment design.

f. Other Topics

Other discussion topics included maintenance planning, the maintenance backlog, once per cycle surveillance test scheduling, outage activities, and security program problems.

The licensee indicated that efforts were underway to reduce the maintenance backlog and implement a maintenance planning group. The licensee does not expect the planning group to be fully developed until the end of the current outage (although planning procedures should be in place by this fall). The licensee stated that the number of outstanding maintenance requests has been decreasing, although the number increased during the recent Boston Edison strike. The licensee indicated that the number of open maintenance requests by itself was not a good indicator of the plant physical condition. On another maintenance item, the licensee indicated that the deficiency stickers for the control rod position indication system in the control room could not be cleared without extensive under vessel work. The status of these repairs was questioned during a recent visit to the site by an NRC commissic ar.

The licensee briefly discussed some of the recent surveillance test scheduling problems, and indicated that the testing frequency for once-per-cycle tests would be clarified with NRR. The NRC regional staff discussed the importance of carefully reviewing the surveillance frequency for each type of once-per-cycle test and noted that certain safety-related electrical equipment, required to be calibrated once-per-cycle, had recently been found out of calibration.

Security staffing problems and the amount of inoperable security equipment (requiring compensatory measures) was discuss. Boston Edison indicated that staffing levels for the contractor security force would be increased and overtime closely monitored by Boston Edison management in the future. Boston Edison agreed to furnish the Pilgrim Senior Resident Inspector with the expected completion date for engineering evaluations of the scope of security equipment improvements. Subsequently, the licensee indicated that the evaluations would be completed by August 18, 1986.

Boston Edison stated that a major decontamination effort would be made in the plant during the current refueling outage. The licensee expects to decontaminate areas with safety-related equipment in the reactor building quadrant rooms so that these areas can be toured without protective clothing.

3.0 Concluding Statements

At the end of the meeting, Dr. Murley requested that Boston Edison be prepared to discuss the following issues during the next management meeting:

- -- Overtime control during the plant startup
- -- The expected scope of startup testing
- -- Containment leakage test results and fixes
- -- Mark I containment enhancements
- -- Updated outage schedule

Dr. Murley also indicated that the NRC will need to review Boston Edison's start up plans and hold points.

ATTACHMENT TO MEETING REPORT

50-293/86-30

MEETING ATTENDEES

Boston Edison Company (BECo)

J. Lydon Chief Operating Officer
E. Howard Vice President - Engineering & QA
A. Oxsen Vice President - Nuclear Operations
A. Pedersen Plant Manager
K. Roberts Director of Outage Management
R. Swanson Nuclear Engineering Manager
S. Hudson Operations Section Head
C. Gustin Manager, Public Information

U. S. Nuclear Regulatory Commission

Regional Administrator T. Murle, Director, Division of Reactor Projects R. Starostecki Director, Division of Reactor Safety S. Erneter Chief, Reactor Projects Branch #1 H. Kister Chief, Operations Branch L. Bettenhau en Chief, Engineering Branch J. Durr Chief, Reactor Projects Section 1B J. Strosnider Chief, Facilities Radiation Protection Section M. Shanbaky Senior Resident Inspector, Pilgrim M. McBride G. Nejfelt Resident Inspector, Hatch Safeguards Specialist G. Smith Project Manager, NRR P. Leech

Press

J. Gehorgam Associated Press J. Impemba Boston Herald



UNITED STATES NUCLEAR REGULATORY COMMISSION REGIONI STI PARK AVENUE

KING OF PRUSSIA, PENNSYLVANIA 19406

APR 0 1 1987

The Honorable William B. Golden Massachusetts State Senate Boston, Massachusetts 02133

Dear Mr. Golden:

This letter is in reply to your letter dated February 25, 1987, regarding our proposed meeting to discuss issues relating to the Pilgrim Auclear Power Station.

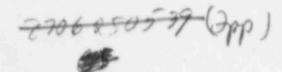
I recognize that considerable time has passed since you filed your Petition on July 15, 1986, which requested that the Boston Edison Company (BECo) be ordered to show cause why Pilgrim should not remain closed or have its operating license suspended until BECo demonstrates that the issues raised by you have been resolved. While I appreciate your concerns on this matter, I want to make it clear that this delay does not mean the NRC has prejudged your Petition or denied its contentions. Rather, the delay has resulted from the NRC staff's recognition that the plant has remained in a shutdown condition since April, 1986, and, during this period, considerable changes have occurred and continue to occur in the substantive areas outlined in your Petition. As was indicated in Mr. James Taylor's letter to you, dated December 19, 1986, the NRC will formally respond to the issues raised in the Petition. Further, NRC will not agree to the restart of the plant until the issues which developed during its prolonged shutdown have been addressed to the satisfaction of the NRC.

In response to the specific questions in your letter, the following clarification is provided.

First, our proposed meeting is not intended to substitute for the completion of agency action on your Petition. The purpose of the meeting is to discuss NRC's actions regarding the Pilgrim plant, and answer questions you have, as we continue to evaluate the licensee's program to correct previously identified problems. Several senior members of the Region I staff will attend the meeting, and they will be able to address the technical issues which arise during the meeting.

Second, we are willing to have the meeting open to all the co-petitioners as well as any other interested party, including the licensee. However, for the sake of efficiency, we request that each group be represented by one or two preselected spokespersons and that time limits be pre-established for each group and/or topic. We have no objection to a transcript of the meeting, but we can discuss this matter further.

Third, we do not intend to substitute BECo's Restart Readiness Report for an NRC response to the issues raised in your petition.



My staff will be in touch with your office to arrange a meeting in the near future.

Sincerely,

Thomas E. Murley Regional Administrator

cc: The Honorable Barbara A. Hildt The Honorable Frank M. Hynes Rachel Shimshak, Massachusetts Public Interest Research Group William Abbott, Plymouth County Nuclear Information Committee Gail Reed, Pilgrim Ailiance

bcc:

B. Karn

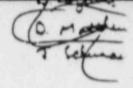
P. Polk
J. Wiggins
M. McBride
W. Klingler, IE

J. Partlow, IE

T. Martin

会

Executive Offices 800 Boytston Street 8oston, Massachusetts 02199



Raiph G. Bird Senior Vice President — Nuclear May 15, 1987 BECo 87- 078

Mr. Milliam T. Russell
Regional Administrator
Office of Inspection and Enforcement
U. S. Muclear Regulatory Commission
Region !
631 Park Avenue
King of Prussia

License DPR-35 Docket 50-293

Dear Sir:

In response to your April 7, 1987 staff letter, Boston Edison reviewed the current overall work plans for emergency preparedness. Based on that review, we request that you remove the date of August 12, 1987 for an Exercise at the Pilgrim Nuclear Power Station from the tentative schedule.

In addition, the Massachusetts Civil Defense Director, R. Boulay, has informed Mr. E. Thomas, Chief of Natural and Technological Hazards Division, Region 1, Federal Emergency Management Agency, that he is not certain that his organization can support an exercise on August 12, 1987. (see enclosure) I will contact you with preferred Exercise dates in the near future.

Klobie R. G. Bird

TFF/pac

CC: Ron Bellamy
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Peter N. Agnes, Jr.
Assistant Secretary of Public Safety
Commonwealth of Massachusetts
Executive Office of Public Safety
One Ashburton Place
Room 2133
Boston, Massachusetts 02108

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N/9

BOSTON EDISON COMPANY

Page Two

cc: Robert Boulay, Director
Massachusetts Civil Defense Agency and Office
of Emergency Preparedness
400 Morcester Road
P.O. Box 1496
Framingham, Massachusetts 01701-0317

Thomas P. Rodger, Director Area Two Massachusetts Civil Defense Agency P. O. Box 54 Bridgewater, Massachusetts 02324-0054 I hope that this letter clarifies the position of this agency regarding its participation in a graded exercise for Pilgrin Station. Please do not hesitate to contact me if you have any questions regarding this matter.

X Julias

Director

CC: Assistant Secretary Peter W. Agnes, Jr.
Deputy Director John L. Lovering, MCDA/OEP
Mr. Carl Gustin, Boston Edison Company
Mr. Roger Silve, Soston Edison Company
Chief Executives of Pilgris EPZ and Host Communities
Area II Director Thomas P. Rodger, MCDA/OEP

BOSTON EDISON
Executive Offices
800 Boylston Street

Boston, Massachusetts 02199

Ralph G. Bird Senior Vice President — Nuclear

BECo 87-090 May 30, 1987

William T. Russell
Regional Administrator
U. S. Muclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

License DPR-35 Docket 50-293

Report of Defect or Noncompliance As Required By 10CFR Part 21, Loose and/or Missing Bolts on Hydraulic Control Unit (HCU) Structural Frames

Dear Sir:

Pursuant to the requirements of 10CFR 21.21(b)(2), this letter provides written notification of a condition at Pilgrim Station that could constitute "A Substantial Safety Hazard" within the context of 10CFR 21.3 (Definitions). Mr. L. Dorflein of the MRC Region I was notified by telephone on 5/29/87 following completion of our evaluation on 5/27/87.

The attachment describes the reportable condition of loose and/or missing bolts on Hydraulic Control Unit Structural Frames.

R. G. Bird

Attachment

cc: See next page

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N/10

Attachment

We have recently identified deficiencies involving loose and/or missing bolts in the Hydraulic Control Unit (HCU) support frames of the Control Rod Drive (CRD) System at the Pilgrim Nuclear Power Station. The deficiencies could impair the ability of the support frames to withstand a Safe Shutdown Earthquake (SSE). 31 of 145 Hydraulic Control Units were affected. The Hydraulic Control Units were installed by Reactor Controls Inc. under contract to Bechtel Power Corp. to a specification written by the General Electric Company.

Whether these deficiencies occurred during initial installation, during maintenance and overhaul, or during operation (i.e. vibration) could not be conclusively established. We have been informed that similar deficiencies were found at the Perry Plant and were attributed to original installation. Accordingly, for the purposes of Part 21 reportability, we are conservatively assuming the deficiencies occurred during initial installation and are filing this report.

We began our investigation into the HCU support frame problem following receipt of a General Electric Company letter, G-HK-6-326. The letter informed Boiling Water Reactor (BWR) Owners that missing or loose hold down bolts on the HCU support frames had been identified at a EWR/6. We completed our investigation May 27, 1987 and concluded that a Part 21 notification would be prudent.

The HCU support frame design at Pilgrim Station is similar to that found at other BWR's. BECo investigations determined that the HCU frame configuration at PNPS is not laterally supported near the location assumed in G.E.'s generic test configuration. The G.E. test configuration did not therefore envelope the Pilgrim site specific configuration and the safety assessment supported by the G.E. test did not apply. General Electric's letter notifying the BWR owners of the existence of this problem states:

"Neither the missing or loose hold down bolts or the erroneous BJM attachment observed at the BWR/6 constituted a safety problem during a faulted event nor would they at any BWR."

This statement could potentially mislead utilities into not recognizing the potential impact of this concern on their facilities or influence the sense of urgency with which utilities check for the existence of this problem at their facility.

The deficiencies found at Pilgrim Station have been documented in a failure and Malfunction Report. A prompt 10CFR50.72 notification has been made and a 10CFR50.73 written submittal is being issued under separate cover. Because the specific root cause could not be established, corrective actions are being implemented to address various potential root causes.

For the purpose of this report, assuming the cause of the loose and/or missing fasteners was initial installation, our corrective action includes restoring the HCU's to original design prior to declaring the system operable. Additional corrective action to inspect the bolts under a preventive maintenance program is being taken to address the other potential causes.

Mr. William T. Russell Regional Administrator

Page Two

cc: Director (3 copies)
Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. R. H. Wessman, Project Manager Division of Reactor Projects Office of Nuclear Reactor Regulations U. S. Nuclear Regulatory Commission 7920 Norfolk Avenue Bethesda, MD 20184

Senior NRC Resident Inspector Pilgrim Nuclear Power Station



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

June 19, 1987

istribution: VStello - Awessman JTaylor FKantor TRehm FConge1 EDO 2654 BABoger TMurley Central File JSniezek WLazarus, RI DMossburg WPaton, OGC SECY OGC CA CRVan Niel RWStarostecki EPB r/f RBellamy, RI JWiggins, RI CDeliso, NRR DMatthews. NRR

The Honorable Gerry E. Studds United States House of Representatives Washington, DC 20515

Dear Congressman Studds:

I am responding to your March 6, 1987 letter requesting that the Nuclear Regulatory Commission (NRC) address a number of issues regarding the Pilgrim Nuclear Power Station as raised by the Citizens Urging Responsible Energy (CURE), in their letter to you of February 6, 1987. Responses to these issues were prepared by the NRC staff and are enclosed. The CURE letter of February 6, 1987, which was attached to your letter, had not previously been received by NRC.

The Commission will hold a public meeting to be briefed by staff on the readiness of Pilgrim to resume operations before allowing restart of the plant. As a prerequisite to restart, the licensee, Boston Edison Company, must satisfy itself and the NRC that the facility and its operating staff and managers are ready to resume operation.

Boston Edison has not yet made such a determination. Consequently, we do not believe it is appropriate at this time to speculate on the extent and nature of further changes needed. However, we do agree with CURE that a number of issues have been identified which must be addressed before restart. In the interim, NRC is reviewing the remedial measures being instituted by the licensee.

Commissioner Asselstine disapproved this response.

Sincerely

Thomas M. Roberts Acting Chairman

Enclosure: Response to Issues

Originated: NRR: Van Niel

2706050529 (GRP)

I. Proposed Rule Related to Emergency Planning

The Commission, after huiding a public meeting, voted to publish in the Federal Register (Vol. 52, No. 44 dated March 6, 1987) a notice of a proposed rule regarding the situation where there is a lack of cooperation by state and/or local governments in emergency planning. The amendment under consideration would by no means exclude state and local participation in emergency planning. The proposed rule would be directed only at those cases where state and/or local governments refuse to participate in such planning. Utility licensees would be granted no additional power or authority. The proposed rule, which applies only to those nuclear power plants for which no full power license has been granted, would not guarantee an operating license to any particular plant or plants. The Commission can grant an operating license only if it finds reasonable assurance that the public health and safety will be adequately protected.

II. Proposed Rule Related to Radioactive Emissions

We assume that the reference to the proposed rule change to raise the tolerable levels of radioactive emissions from nuclear power plants is directed to the proposed revision to the Commission's regulations 10 CFR Part 20 as published in the <u>Federal Register</u> on January 9, 1986 (Voi. 51, No. 6, page 1992). The notice in the <u>Federal Register</u> provided interested members of the public the opportunity to comment on the proposed rule. Your comments and those relating

IV. Pilgrim Emergency Plans

CURE states that the Pilgrim plant has operated for 14 years without a fully approved evacuation plan. This is misleading because, prior to 1980, there were no detailed evacuation planning requirements included in the NRC's emergency planning regulations. Pilgrim did comply with NRC emergency planning requirements from 1972, when the plant was licensed, until 1980, when new requirements were imposed. Also, as explained below, emergency planning for Pilgrim has been adequate since 1980.

For each nuclear power plant which held a license to operate at the time the NRC final rule on emergency planning became effective (November 3, 1980), as was the case with Pilgrim, the NRC based its post-1980 reasonable assurance findings for each operating reactor on consideration of: (1) upgraded licensee. State and local government emergency plans that substantially met the requirements of the final rule; (2) a review of the onsite plans by the NRC; (3) a comprehensive appraisal conducted by the NRC at the operating reactor site to verify the implementation of the licensee's plan; and (4) the evaluation of a joint exercise involving the licensee, state and local governmental organizations. These reviews and appraisals were conducted between 1980 and 1982. The onsite portions of such exercises were observed by the NRC while the offsite portions were observed by the Federal Emergency

Management Agency (FEMA). FEMA provided the NRC with its assessment of the exercises. Consideration of the emergency plant, this series of evaluations, and associated corrective actions resulting from the evaluations constituted the means by which the NRC determined there was an adequate level of emergency preparedness at this and other nucleur power plants with operating licenses. Thus, both the NRC and FEMA found that emergency planning at Pilgrim was adequate. The "interim approval" status mentioned in CURE's letter likely refers to FEMA's "interim findings" provided in instances where FEMA had not completed its formal administrative review of offsite plans and preparedness under FEMA's regulation 44 CFR 350. Since 1982, the Pilgrim plant has participated in emergency preparedness exercises where onsite and offsite response capabilities were demonstrated and evaluated by the NRC and FEMA. On four separate occasions, FEMA has reported to the NRC the adequacy of offsite response capabilities.

The NRC has requested that FEMA evaluate the offsite emergency planning and preparedness issues raised in the July 15, 1986 petition filed by Senator Golden, et al. (see below). FEMA has reported that on December 22, 1986, the Commonwealth of Massachusetts' Secretary of Public Safety sent FEMA a copy of the Office of Public Safety report entitled, "Report to the Governor on Emergency Preparedness for an Accident at the Pilgrim Nuclear Power Station." In addition, the Office of Public Safety recently requested FFMA, Region I, to

the issues raised, the specificity of the information provided, whether additional information is meeded or analysis required, and whether responses to the petition from the component of the or others are appropriate. In this case, the Staff decided that it can opportunity to formally respond to the petition after the like can opportunity to address the issues raised by the petition and the NRC had an opportunity to review the likensee's actions and other necessary information. While the NRC continues to evaluate the likensee's program to correct previously identified problems, the NRC has proposed a meeting with Senator Golden in order to discuss the NRC's actions and to answer any questions the Petitioners may have. We expect such a meeting will be held in the near future.

"public investigation." Although it is not entirely clear what is meant by a public investigation, we have stated how we intend to address the issues in this case. As stated in the attached April 1, 1987 letter to Senator Golden, (1) the NRC will formally respond to the issues raised in the Senator's Petition, and (2) the NRC will not agree to the restart of the plant until all of the identified problems have been addressed to the satisfaction of the NRC.

VI. Operating Problems at Nuclear Power Plants

The NRC has ongoing programs to monitor the performance of nuclear power plants and to detect deteriorating performance such that timely corrective actions can be initiated. For example, the NRC's Systematic Assessment of Licensee's Performance (SALP) program has successfully identified areas where licensees'

NRC was warranted. In the specific case of Pilgrim, it was the NRC's SALP report which documented the staff's concerns with operations at the plant and diagnosed the problem relating to management involvement and oversight. Within a few months after this critical review, Boston Edison Company identified some problems that further supported the SALP findings; subsequently the licensee agreed to delay restart in order to institute more effective corrective measures and to allow the newly assigned managers time to address the issues in a deliberate manner.

The Report to Congress on Abnormal Occurrences, NUREG-0090, is another ongoing program by which the NRC identifies significant events to Congress and the public. The requirement for abnormal occurrence reporting was established to especially highlight significant events from the standpoint of public health and safety. When an event is determined to meet the reporting criteria, additional NRC resources and public attention are focused on the licensee's activities to ensure that corrective actions are completed in a timely manner to reduce the likelihood of a similar event. The number of abnormal occurrences for operating plants having Mark I containments does not appear to be significantly higher than that of other plants having different containment designs. However, this does not minimize the importance that the NRC places on plants having this containment design. Recently, the NRC initiated the Performance Indicator Program which will contribute to the early detection of declining performance of plant operations. The goal of all of these programs is to monitor licensees' performance in a proactive manner to enable timely corrective actions to prevent accidents and protect public health and safety.



NUCLEAR REGULATORY COMMISSION REGION I

SJI PARK AVENUE KINC OF PRUSSIA, PENNSYLVANIA 19408

SEP 2 9 1987

Commonwealth of Massachusetts
Civil Defense Agency and Office
of Emergency Preparedness
ATTN: Mr. Robert J. Boulay
Director
P.O. Box 1496
400 Worcester Road
Framingham, Massachusetts 01701-0317

Dear Mr. Boulay:

In your letter of July 24, 1987, you requested we acknowledge that you have determined the plume exposure emergency planning zone (EPZ) should be reconfigured for the Pilgrim Nuclear Power Station to include the towns of Carver and Marshfield in their entirety. We subsequently understand that this reconfiguration has now been deferred to enable priority attention be given to your ongoing efforts with the current EPZ communities, the Boston Edison Company and FEMA in improving emergency planning and preparedness within the current EPZ. We encourage these efforts to improve emergency preparedness.

Sincerely,

William T. Russell Regional Administrator

cc:

E. Thomas, FEMA I R. Bird, BeCo

bcc:

T. Murley, NRR
R. Starostecki, NRR
F. Miraglia, NRR
W. Kane, RI

88\$113\$414 (p)

Kant Niel Hogan

To: DKK NEDMON FROM: CH

WASHINGTON, DC 20810

Docember 18, 1987

Mr. Lando W. Zech, Jr. Chairman United States Nuclear Regulatory Commission 1717 H Street, N.W. Washington, D.C. 20555

Doar Mr. Zech:

As Chairman of the Senute Labor and Human Resources Committee, I will be holding a hearing in Plymouth, Massachusetts on the evening of January 7, 1988 concerning the proposed restart of the Pilgrim Nuclear Power Station and its potential impact on the public nealth.

The Committee on Labor and Muman Resources has oversight responsibility for public health issues. I believe the upcoming decision on the Pilgrim restart could possibly have dramatic implications concerning the health of my constituents in Massachusetts.

As Chairman of the Nuclear Regulatory Commission, you are uniquely qualified to speak for the Commission concerning the decision-making process on the restart question. Therefore, your testimony will be an expential component of the hearing.

In the event you are unable to participate on January 7th, please designate the appropriate NRC representative(s) for an appearance before the Convilled that avening. Specifically, the Committee is interested in hearing testimony from the NRC with regard to the rules, regulations, standards and criteria it would apply during consideration of a Pilgrim restart request.

Memhers of my staff will be available to meet with NRC officials prior to the hearing to provide the Commission with additional details. Since the hearing is scheduled for early January, I would appreciate your timely response to this request.

Thank you for your assistance, and I look forward to seeing you in Plymouth.

Edward M. Kennedy

Chairman Committee on Laboy and Numan Resources

October 20, 1987

NOTE TO: Dick Wessman, NRR

Bill Paton, OGC

FROM: Mike Blume, OGC

SUBJECT: MASSPIRG v. NRC (PILGRIM 1ST CIRCUIT CASE)

Enclosed is a first cut of what is known as a "Certified Index of the Record," to be submitted to the Court of Appeals on November 10, 1987. The "Record" in this case is what was placed before the Agency by the petitioners, and whatever else the Agency relied upon. The attached list -- the "Certified Index" -- is a complete listing of all documents enclosed with or cited by the Petition and the Director's Decision. The advantage of the certified index is that we don't have to burden the Court with unnecessary documents. Unfortunately, though, the Commission Secretary, who will certify to the Court that the index represents the record, must have all of the documents that are listed. Accordingly, I'm requesting that you go over the list, and provide to me ASAP, copies of all of the listed documents that we have. Please note for me which ones we do not have. To the extent we don't have them, it's probably safe to assume that we didn't consider them or rely upon them, and thus they'll be deleted from the list. Also, please add to the list (and provide to me) any documents that we considered or relied upon, but which were not cited.

Many thanks for your continuing assistance!

Enclosure: As stated

8814139412 (14PP) Document Name: CERT. RECORD

Requestor's In: WOHL

Author's Name: Lessler

Document Comments: Pilgrim Nuclear Station - Certified Index

Destination Name: WOHL

Distribution Name: NRCOCA_LESSLER_0032

Addressee: Marilyn Wohl, PDI-3, Rm 116, x27831

Date Sent: 10/20/87

Time Sent: 13:57

Message: Please deliver to Dick Wessman from Mike Blume, OGC (x41493).

Thanks, Linda Lessler

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BOSTON ELECTRIC COMPANY (Pilgrim I Nuclear Power Station)

Docket No. 50-293 (2.206 Request)

CERTIFIED INDEX

Date Docketed Office of the Secretary	Date of Document	Title or Description of Document
	11/9/71	Task Force Review, Bypass Effects in GE Pressure Suppression Containment
	12/1/71	Task Force Review, Bypass Effects in GE Pressure Suppression Containment
	9/20/72	AEC internal report by Stephen H. Hanauer, raising seven concerns centering on the viability of the pressure-suppression containment concept
	9/25/72	Memo from Joseph M. Hendrie to John F. O'Leary, Re: acceptance of pressure- suppression containment concept
	1/15/73	Memo from S. H. Hanauer to E. J. Bloch, Re: Bypass Paths on BWR Pressure Suppression Containment
	1975	Manual of Protective Action Guides and Protective Actions for Nuclear Accidents, EPA-520/1-75-001, EPA
	2/75	Letter from NRC to all utilities owning BWR facilities with Mark I design containments
	4/75	Letter from NRC to all utilities owning BWR facilities with Mark I design containments

Date Docketed Office of the Secretary	Date of Document	Title of Document
	1976	ANSI Standard 18 7-1976, Section 5.2.6, Equipment Control
	1977	Study published by Massachusetts Public Interest Research Group entitled "Nuclear Incuation Planning: Bluepring or Chaos"
	6/20/78	Memo from Dr. Hanauer to Dr. Hendrie, ouoting from NUREG-0474
	7/78	NUREG-0474, "A Technica, Update on Pressure Suppression Type Containments in Use in U.S. Light Water Reactor Nuclear Power Plants"
	12/78	Union of Concerned Scientists, "An Analysis of Chairman Hendrie's Response to Senator Hart's Letter of June 15, 1978"
	1980	IE Bulletin 80-10, "Contamination of Nonradioactive System and Resulting Potential for Unmonitored/Uncontrolled Release to the Environment"
	7/80	NUREG-0661, "Mark I Containment Long Term Program Safety Evaluation Report"
	8/19/80	45 Fed. Reg. 55402
	11/80	NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants"
	1981	SALP Report
	7/20/81	Response of Boston Edison Co. to Commonwealth of Massachusetts' First Set of Interrogatories on Emergency Planning
	1982	Cover letter from Richard C. Young, Director, Office of Inspection and Enforcement, NRC to BECo, with NRC 50-293/EA 81-63, Order Modifying License Effective Immediately

DOCKET NO. 50-293 (2.206)		- 3 -
Date Docketed Office of the Secretary	Date of Document	Title of Document
	1982	SALP Report
	1982	Civil Penalty and Order re: Modifying the Pilgrim License
	8/82	Comments of Attorney General Francis X. Bellotti Relative to Off-Site Emergency Planning for the Pilgrim Nuclear Power Station, submitted to FEMA
	9/29/82	Report issued by Federal Emergency Management Agency, Region I entitled: "Joint State and Local Radiological Emergency Response Capabilities for the Pilgrim Power Station, Plymouth, Massachusetts"
	10/27/82	Plant Unique Analysis Report (PUAR) of the Suppression Chamber - Mark I Containment Long Term (TR-5310-1)
	1983	Updated study published by Massachusetts Public Interest Research Group entitled "Blueprint for Chaos II: Pilgrim Disaster Plans Still a Disaster"
	1/83	Report on the Pilgrim Nuclear Power Station Siren Test, FEMA
	1983	MASSPIRG study of two hospital (Jordan Hospital, Plymouth, and Morton Hospital, Taunton)
	10/26/83	Plant Unique Analysis Report (PUAR) of the Torus Attached Piping - Mark I Containment Long Term Program (TR-5310-2)
	1984	SALP Report 50-293/84-34
	1985	SALP Report
	1985	NRC Inspection Report 50-293/85-13
	1985	NRC Inspection Report 50-293/85-22

Secretary	Date of Document	Title of Document
	1985	Notice of Violation (Inspection Report 50-293/85-32, cover letter from Thomas Martin, Director, Division of Radiation Safety and Safeguards, and Appendix A, Notice of Violation)
	1985	LER No. 85-26
	1985	Inspection number 85-24 (revealed security level III violation)
	1/25/85	Quality Assurance Surveillance, 85-1.2-
	1/30/85	NRC staff issued Safety Evaluation Report
	4/85	Report by Stone & Webster (predicted Pilgrim facility's waste would contain about 1024 curies that year)
	7/85	NUREG-0956, "Reassessment of the Technical Bases for Estimating Source Terms"
	7/12/85	Nuclear Operations Manager (NOM) Memorandum, M85-137, Control and Verification of Operating Actions
	8/8/85	50 Fed. Reg. 32138, "Policy Statement on Severe Reactor Accidents Regarding Future Designs and Existing Plants"
	10/85	Letter from FEMA to MCDA, outlining FEMA concerns
	1/86	Letter from FEMA to MCDA, outlining FEMA concerns
	1/86	Steven Sholly and Dr. Gordon Thompson, "The Source Term Debate," Union of Concerned Scientists
	2/18/86	SALP Report No. 50-293/85-99
	2/21/86	IE Information Notice No. 86-13
	4/2/86	Special NRC Inspection Report 50-293/86-06

Date Docketed Office of the Secretary	Date of Document	Title of Document
	4/12/86	Confirmatory Action Letter (CAL) 86-10, issued by Region I Administrator
	5/21/86	Article, <u>Boston Globe</u> , re: NRC Commissioners ordering the Pilgrim facility to remain shut down temporarily because of safety problems
	5/22/86	Statement of James Asselstine before the Subcommittee on Energy Conservation and Power
	5/23/85	Statement of NRC Commissioners at hearing before U.S. House Subcommittee on Energy Conservation and Power, Boston Globe
	5/28/86	Telephone Interview with James Asselstine, Boston Globe
	6/86	NUREG/CR-4594, "Estimated Safety Significance of Generic Issue 61"
	6/6/86	MCDA response to FEMA's October, 1985 letter
	6/9/86	Statement of Harold Denton, Director, Nuclear Reactor Regulation, quoted in <u>Inside NRC</u> , Vol. 8, No. 12
	6/18/86	Article, <u>Boston Globe</u> , (example of BECo's failure to insure proper surveillance)
	6/18/86	Testimony of Edward A. Thomas, Division Chief, Natural and Technological Hazards, FEMA, before Massachusetts State legislators
	6/18/86	Statement of Mr. Lubering, Deputy Director of the Massachusetts Civil Defense Agency, before Massachusetts legislators
	6/21/86	Joseph M. Hendrie, Letter to the editor, New York Times, concerning review issues in the GE containments

Date Docketed Office of the Secretary	Date of Document	Title of Document
	6/24/86	Article, Borton Globe
	6/26/86	Massachusetts Department of Public Utilities report
	6/27/86	Excerpts of Massachusetts Department of Public Utilities Report, Boston Globe
	6/28/86	Statements by FEMA and MCDA officials, Patriot Ledger
	7/9/86	Statement of James Asselstine, Patriot Ledger
	7/15/86	Petition for Show Cause Concerning Pilgrim I Nuclear Power Station
	8/27/86	Letter from Murley, Region I, NRC to J. Lydon, BECo re: CAL 86-10
	12/86	Report issued by the Office of Public Safety of the Commonwealth of Massachusetts entitled "Report to the Governor on Emergency Preparedness for an Accident at the Pilgrim Nuclear Power Station"
	12/19/86	Letter from James M. Taylor, Director, Office of Inspection and Enforcement to Senator Golden
	1/87	Report prepared by Impell Corporation for BECo entitled "Evaluation of Offsite Emergency Preparedness in Area Surrounding the Pilgrim Nuclear Power Station"
	2/20/87	Letter from Thomas Murley, Regional Administrator, NRC Region I to Senator Golden re: Delay of Meeting with Petitioners
	3/31/87	Memorandum from FEMA to NRC re: FEMA's conduct of a self-initiated review of the overall state of emergency preparedness at Pilgrim Station

Date Docketed Office of the Secretary	Date of Document	Title of Document
	4/1/87	Letter from Thomas E. Murley, Regional Administrator, NRC Region I to Senator Golden re: Meeting between NRC and Petitioners
	4/29/87	Memorandum from the NRC to FEMA, with attached copy of March 1987 report by the Town of Plymouth Nuclear Committee entitled "Report to the Selectmen on the Plymouth Radiological Emergency Response Plan"
	4/30/87	Letter from S. Varga, NRC to R. Bird, BECo re: Request that licensee provide details of modifications and procedural changes
	5/26/87	Article, <u>Boston Globe</u> , re: pressure suppression systems at Chernobyl and Pilgrim
	6/4/87	Reports prepared by BECo re: Evacuation Time Estimates and Beach Population Sheltering, Mobility Impaired, and Special Facilities
	6/12/87	Report by BECo re: A Northern Reception Center
	6/17/87	Final SALP Report No. 86-99 (initially issued 4/8/87)
	7/?9/87	FEMA Analysis of the issues raised in the subject petition entitled "Analysis of Emergency Preparedness Issues at Pilgrim Nuclear Power Station Raised in a Petition to the NRC Dated July 15, 1986" (Attachment to Director's Decision)
	7/30/87	Report submitted by BECo entitled "Pilgrim Nuclear Power Station Restar Plan"
	8/87	NUREG-1251, "Implications of the Accident at Chernobyl for Safety Regulation of Commercial Nuclear Power Plants in the United States"

Docket No. 50-293 (2.206)		- 8 -
Date Docketed Office of the Secretary	Date of Document	Title of Document
	8/4/87	Report from FEMA entitled "Self-Initiated Review and Interim Finding for the Pilgrim Nuclear Power Station"
	8/5/87	Report submitted by MASSPIRG entitled "Health Surveillance of the Pilgrim Area" as addendum to the Petition
	8/6/87	Letter from FEMA to the NRC forwarding 8/4/87 FEMA report entitled "Self-Initiated Review and Interim Finding for the Pilgrim Nuclear Power Station, Plymouth, MA"
	8/21/87	Interim Director's Decision 87-14
	Undated	Brief description of the Pilgrim Mark I Containment Design
	Undated	Enclosure A to NUREG-0474, "Summary of NRC Staff Actions Related to the Technical Issues Identified in Dr. Hanauer's Memorandum of September 20, 1972
	Undated	Pilgrim Station Regulatory Performance History
	Undated	NUREG-0713 and 0714 "Occupational Radiation Exposure at Commercial Nuclear Power Reactors"
	Undated	Updated survey by the Special Legislative Commission on Low Level Radioactive Waste
	Undated	Deficiency Report (DR1 No. 1384
	Undated	51 Fed. Reg. 29728
	Undated	NRC's Standard Review Plan
	Undated	WASH 1400 (Reactor Safety Study)
	Undated	The Reactor Risk Reference Document - Draft (NUREG-1150)
	Undated	NUREG-1250, "Report on the Accident at the Chernobyl Nuclear Power Station"