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The Honorable Lando W. Zech, Jr.
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Zech:

SUBJECT: PROPOSED RESTART OF THE PILGRIM NUCLEAR POWER STATION

During the 341st meeting of the Advisory Committee on Reactor Safeguards, September 8-10, 1988, we reviewed the proposed restart of the Pilgrim Nuclear Power Station. Members of the Committee visited the plant on August 25, 1988, and a meeting of our subcommittee on Pilgrim Restart was held in Plymouth, Massachusetts, with representatives of Boston Edison Company and the NRC staff on August 26, 1988. During our 341st meeting, we had further discussions with members of the NRC staff and with representatives of the Boston Edison Company. We received comments from representatives of the governments of the Commonwealth of Massachusetts and nearby localities, as well as individuals. We also had the benefit of the documents referenced.

By the time of the Pilgrim plant shutdown in April of 1986, the NRC staff had developed serious reservations about the management of the plant. We therefore gave special attention to this issue. More than half of the upper and middle level management personnel of the plant have been replaced since the plant last operated. The new management group is made up of people of demonstrated competence. A new vice president with responsibility for Boston Edison's nuclear power program was employed about a year ago. He has assembled a team whose members have a variety of experience in naval and commercial nuclear power plant operation. We are favorably impressed by their credentials and by the changes in the physical plant and the organizational approach to operation that has occurred since the new group has been in place. Although there is a preponderance of navy as contrasted with commercial nuclear power plant experience, we found no reason for concern in the backgrounds of the present team and in the approach to management and to operation that has been inaugurated.

Those members of the Committee who toured the plant were favorably impressed with decontamination of the plant which has occurred, with the way in which the operational staff is organized, and with the way in which operation and maintenance were being performed.

We also examined a number of systems that have been installed in an effort to improve the plant's and the operational staff's capability to avoid and to mitigate the consequences of severe accidents. During our visit to the training center, we observed the operation of the simulator that has been installed since plant shutdown. It is a modern and versatile system, and appears to have been effectively integrated into their training program. Its capabilities are being used to train the operational staff in the application of the newly installed systems mentioned above. The simulator can be expected to

have a marked positive influence on the readiness of the operational staff to deal with both normal and off-normal events.

Because of the history of weather-related loss of off-site power at this site, an assured source of emergency power or a demonstrated capability to provide emergency cooling in the absence of electric power is of special importance for the Pilgrim plant. Since the shutdown, a number of features have been added that contribute to increased safety of the plant. Among these are an additional emergency diesel generator and a system that permits water from the fire protection system to be made available to the decay heat removal system. These added features should decrease the risk associated with the loss of electric power. However, we are not sure, and the staff and licensee are not certain, that the plant systems now satisfy the station blackout rule. We recommend that the staff give particular attention to this item as the rule is being implemented.

We understand that use of the hardened vent, for relieving possible torus overpressure during a severe accident, will be reviewed by the NRC staff as a generic issue for all Mark I containments. We intend to review the matter in that context.

A report, dated August 6, 1987, from the Federal Emergency Management Agency, states that the Emergency Plan which existed at the time of plant shutdown has a number of inadequacies. Information provided to us indicates that significant progress has been made in correcting these deficiencies. We recommend that before startup is approved, a clearly defined program for early correction of these inadequacies be available and be approved by the NRC staff.

We believe that, subject to the comments above, restart of the Pilgrim plant will not lead to undue risk to the public health and safety.

Sincerely,

William Kerr
Chairman

References:

1. NRC Confirmatory Action Letter to Boston Edison Company dated April 12, 1986 and Supplementary Confirmatory Action Letter dated August 27, 1986
2. NRC Memorandum dated July 27, 1988 transmitting Systematic Assessment of Licensee Performance (SALP) Board Report No. 50-293/87-99
3. Memorandum dated June 17, 1987 from W. Russell, Regional Administrator, NRC, to R. Bird, Boston Edison Company, transmitting Systematic Assessment of Licensee Performance (SALP) Report No. 50-273/86-99
4. Memorandum dated May 23, 1986 from T. Murley, Regional Administrator, NRC, to W. Harrington, Boston Edison Company, transmitting Systematic Assessment of Licensee Performance (SALP) Report No. 50-293/85-99

5. Memorandum dated September 7, 1988 from T. Martin;, NRC Region I Office, to R. Bird, Boston Edison Company, Subject: Pilgrim Nuclear Power Station Power Ascension Program
6. Memorandum dated September 7, 1988 from S. Collins, NRC Region I Office, to R. Bird, Boston Edison Company, transmitting NRC Region I Inspection Report No. 50-293/88-21, Integrated Assessment Team Inspection
7. Memoranda dated May 17, 1988 and July 22, 1988 from R. Gallo, NRC Region I Office, to R. Bird, Boston Edison Company, Subject: Inspection No. 50-293/88-11
8. Memorandum dated December 31, 1986 from W. Kane, NRC Region I Office to J. Lydon, Boston Edison Company, Subject, Management Meeting 50/293/86-4
9. Boston Edison Company, Pilgrim Nuclear Power Station, ACRS Briefing books dated August 2, 1988:
 - Volume 1, "Introduction and Restart Plan,"
 - Volume 2, "Appendices to Restart Plan,"
 - Volume 3, "Self-Assessment of Readiness for Restart,"
 - Volume 4, "Power Ascension Program (PAP),"
 - Volume 5, "Safety Enhancement Program (SEP)"
10. Testimony dated August 26, 1988 of Representative Lawrence R. Alexander, House Chairman of Massachusetts' Joint Committee on Energy to the Advisory Committee on Reactor Safeguards
11. Statement dated August 26, 1988 of Douglas Hadfield, Director, Civil Defense for the Town of Plymouth, before the ACRS, at Memorial Hall, Plymouth, Massachusetts
12. Press Release dated August 26, 1988 by Steven Comley representing "We the People, Inc."
13. Statement dated August 26, 1988 by J. Kriesberg, Research Director, Massachusetts Citizens for Safe Energy to the ACRS Hearing on the Restart of the Pilgrim Nuclear Plant
14. "Question for Inclusion in Congressional Record of January 7, 1988 Hearing on the Restart of the Pilgrim Nuclear Power Plant" (undated); Submitted to Ad Hoc Subcommittee on Pilgrim Restart at its August 26, 1988 meeting
15. Testimony dated September 7, 1988 of Representative Lawrence R. Alexander, House Chairman of Massachusetts' Joint Committee on Energy, to the Advisory Committee on Reactor Safeguards
16. Letter dated September 6, 1987 from C. Barry, Secretary of Public Safety, Commonwealth of Massachusetts, to W. Kerr, Chairman, ACRS regarding readiness [to restart] of Pilgrim Station
17. Memorandum dated August 6, 1987 from R. Krimm, FEMA, to F. Congel, NRC, transmitting: "Report of Self-Initiated Review and Interim Finding [of off-site emergency planning] for the Pilgrim Nuclear Power Station," dated August 4, 1987
18. Report dated December 16, 1986 entitled, "Report to the Governor on Emergency Preparedness for an Accident at the Pilgrim Nuclear Power Station" and Supplemental Report dated December 1987, submitted by C. V. Barry, Secretary of Public Safety, Commonwealth of Massachusetts

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