

See 89-273



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

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October 6, 1989

MEMORANDUM FOR: Thomas E. Murley, Director, Office of Nuclear Reactor Regulation
FROM: Thomas T. Martin, Deputy Regional Administrator
SUBJECT: PLYMOUTH NUCLEAR MATTERS COMMITTEE CORRESPONDENCE

The attached letter was received by this office on October 3, 1989. As discussed with you on October 6, 1989, I believe an agency versus regional response is appropriate to avoid the pitfalls of miscommunication. Your agreement to assume responsibility for the response is appreciated. Both Bill Russell and Bill Kane have been provided copies of the letter. I have assigned Bill Kane as our contact on this matter.

Thomas T. Martin
Deputy Regional Administrator

Attachment:
As Stated

cc: W. Russell

8911060063 891026
PDR ADOCK 05000293
H PNU

Plymouth Nuclear Matters Committee
Town of Plymouth
11 Lincoln Street
Plymouth, MA 02360

Mr. William T. Russell
Regional Administrator
Region 1
Nuclear Regulatory Commission
475 A Lendale Rd
King of Prussia, PA 19406

RE: Pilgrim Nuclear Power Station
Direct Torus Vent System

Dear Mr. Russell,

Please find enclosed, copies of correspondence relating to the recently installed hardened wetwell vent at Pilgrim Station. Since several of the issues under discussion concern NRC's review and approval of the system and since you are one of the key individuals involved in the modification, we are seeking your input to help clarify this situation. It would be greatly appreciated if you could respond directly to relevant aspects of this issue in writing to the above address.

Although Generic Letter 89-16 states, "The staff found the installed system and the associated BECo analysis acceptable," we have not been able to conclude this from any of the other existing documentation. Specifically, all of the Safety Evaluations describe only the installation, not the use of the vent. Also, the logic used in Safety Evaluation 2269, dated 1/29/89, which concludes that a change to the Technical Specifications is not required, is very questionable. Do you concur with BECo's argument there?

In addition, inadvertent or premature venting is a very serious safety question, yet, in various documentation, BECo maintains that the DTVS does not involve an unreviewed safety question. If you agree, could you explain why it does not?

Many state and local public officials, as well as numerous consultants realize the close and necessary linkage between controlled venting and emergency preparedness. However, as you may well know, the adequacy of emergency planning for Pilgrim is hotly debated. The topic is even under investigation by the NRC Inspector General's office. Do you believe that the DTVS should have been allowed to be made operational without adequate emergency preparedness by the community and the licensee?

Obviously, this is a far reaching technical and politically sensitive issue within the NRC. In reviewing the documentation, we, of course, would have preferred that the NRC approach to this issue had been more straightforward: if it was a good idea, get behind it and insure that it was designed, installed, and planned for properly, and if it was a bad idea, stop it from being implemented. However, the

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Town of Plymouth
11 Lincoln Street
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Mr. Daniel G. McDonald
Senior Project Manager
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Mail Stop 14D1, 1 White Flint North
11555 Rockville, MD 02852

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Mr. Richard H. Wessman
Project Manager
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20814

RE: Pilgrim Nuclear Power Station
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