

BOSTON EDISON COMPANY
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A. V. MORISI
MANAGER
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

June 5, 1981

BECO. Ltr. #81-123

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

License No. DPR-35
Docket No. 50-293

Dear Sir:

10 CFR 50 Appendix E and NUREG 0654, Revision 1, Appendix 3 require that by July 1, 1981 that the nuclear power licensee shall demonstrate that administrative and physical means have been established for alert and prompt notification of the general public within the plume exposure Emergency Planning Zone. Boston Edison requests an extension of that date for Pilgrim Nuclear Power Station until December 31, 1981.

Boston Edison has been and is continuing to make a good faith effort to provide the above mentioned alerting and notification capabilities to the state and local political jurisdictions involved in this very complex issue. Prior to the distribution of NUREG 0654, Revision 1 we had been working with local and state officials along with the Stone and Webster Engineering Corporation in the design of a system that would be cost effective, meet the federal guidelines, and be accepted as part of the comprehensive emergency preparedness programs of the state and local governments.

Since both the NRC and FEMA recognize that the responsibility for activating such a system is properly the responsibility of state and local governments, Boston Edison is confident that both agencies also recognize the necessity for involving the state and local public officials in this entire process. To this end, the state and local public officials have been involved prior to selecting a contractor to design the system and in fact the staff at the Massachusetts Civil Defense Agency was directly involved in selecting that contractor after a lengthy review of the bidders. Since the selection of Stone & Webster, local and state elected and appointed officials have been involved in numerous meetings to discuss the problems involved in the initial design which is described in the report entitled Prompt Alerting and Notification System - Pilgrim Nuclear Power Station. (A copy of this report distributed in April of 1981 is enclosed.) This total involvement of multi jurisdictions although time consuming will lead to a better end product.

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Boston Edison has recently embarked on the second phase of this project which will involve bid specifications, vendor selections, securing rights of way, ordering of equipment, state and local meetings and hearings, installation, testing, revising procedures, etc. Stone & Webster Engineering Corporation will be assisting in the management of the remainder of this project which will require the aforementioned extension.

Whereas the Commission itself has gone on the record as recognizing that (1) this requirement will present a significant financial impact on the licensee; (2) that the technical basis for this requirement is clearly disputable; and (3) there may never be an accident requiring using the fifteen minute capability (August 19, 1980 45 FR 55407), the licensee submits that this project must be cautiously completed and that the granting of this extension until December 31, 1981 will in no way impede the public health of safety throughout the Emergency Planning Zone.

It should further be noted that the communities surrounding PNPS have systems for notification of the public using inherent capabilities. These systems are mobile voice audible sound systems and while they may not meet the "fifteen minute requirement" they are relatively quick and capable of transmitting more information than a simple audible alert. The existing local systems coupled with the existing state-wide Emergency Broadcast System can and do provide ample capabilities for the prompt alerting and notification functions.

Boston Edison has authorized over one million dollars for the completion of this system, and is making a good faith effort to assure that a viable element of emergency preparedness is completed based upon sound management principles and a firm foundation of public support.

Should you have any questions or require additional information, please do not hesitate to call us.

Very truly yours,

Attachments

cc: Mr. Boyce H. Grier, Director
Office of Inspection & Enforcement
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA. 19406

