



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

PDR
LPDZ

September 11, 1981

Docket No. 50-293/50-471



Jo Ann Shotwell, Esquire
The Commonwealth of Massachusetts
Department of Attorney General
One Ashburton Place
Boston, MA 02108

IN RESPONSE REFER
TO FOIA-81-283

Dear Ms. Shotwell:

This is in response to your letter dated July 16, 1981 in which you requested, pursuant to the Freedom of Information Act, eight categories of documents regarding emergency planning for Pilgrim I and II.

The documents listed on the appendix are enclosed.

This completes action on your request.

Sincerely,

J. M. Felton, Director
Division of Rules and Records
Office of Administration

Enclosures: As stated

APPENDIX

1. June 24, 1981 Memo to Thomas Ippolito from Mark Williams;
Meeting Summary - 6/18/81 meeting with Boston
Edison Co.
2. December 14, 1979 Letter to Frank Pagano from A. E. Desrosiers,
draft review of Emergency Response Plan of the
Pilgrim I.
3. July 1, 1981 Letter to Steve Ramos from A. E. Desrosiers.
4. November 3, 1980 Memo to Thomas Ippolito from Frank Pagano, Review
of Emergency Plan - Pilgrim I.



UNITED STATES
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June 24, 1981

Docket 50-293

MEMORANDUM TO: Thomas A. Ippolito, Chief
Operating Reactors Branch #2
Division of Licensing

FROM: Mark H. Williams, Project Manager
Operating Reactors Branch #2
Division of Licensing

SUBJECT: Meeting Summary - June 18, 1981 meeting with the
Boston Edison Company

On June 18, 1981, a meeting was held with the representatives of the Boston Edison Company (BECo.) listed in Encl.1, regarding the past compliance of Pilgrim Nuclear Power Station Unit I with 10 CFR 50.44. The meeting was requested by BECo.

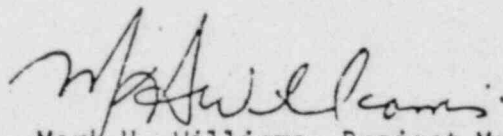
On May 29, 1981, BECo. identified an area of potential non-compliance with the regulation at Pilgrim I. Subsequent findings by BECo. resulted in their determination that a meeting was desirable. In the meeting, BECo. stated that Pilgrim I had not been in compliance with 50.44 from the effective date of the rule to June 2, 1981. This non-compliance was a result of various inadequacies in Management Controls.

The original system which was used to meet the regulation from November 1978 to May 1980 relied on operator actions to meet the single failure criterion of GDC 41. In June 1981, BECo. determined, as a result of an NRC requested review, that such operator actions could not be assured due to the postulated radiation doses in the reactor building subsequent to an accident (BECo. 81-127, 6/15/81). A new system, remotely operated, which did meet the single failure criterion, was installed in the May 1980 outage. Although this system was thought, by BECo., to be in service from May 1980 to June 1981, it was actually disabled during maintenance in July 1980. The purge lines were cut and capped rather than installing elbows as originally specified on a BECo. design change. An investigation is underway at BECo. to determine the manner in which the change request was altered. In addition, it was later discovered by BECo. that even if the lines had not been cut in July 1980, the system was still inoperable since it was valved out of service shortly after the May 1980 outage due to undesirable leakage. Therefore, the unit had not been in compliance with 10 CFR 50.44 at any time in the past. The NRC request which resulted in the BECo. findings was a telephone request in early 1981 based on NRC letter dated October 30, 1979 which requested BECo. to provide a basis for their letter of October 19, 1979, in which BECo. claimed compliance with the 10 CFR 50.44 with existing equipment.

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PDR/LPAR

Boston Edison presented their new program to implement effective Management Controls for Pilgrim I (Encl. 2). The method employed by BECo. forces all work items, regardless of their initiating circumstances (eg. NRC req't, BECo. design change, etc.) into a predetermined network. The network integrates all of the requirements of the operational, technical, and administrative disciplines of the company, which produces the final action. BECo. demonstrated how this future program would mitigate the possibility of future occurrences similar to the 50.44 violation. BECo. also committed to review their compliance with all post 1972 regulations which did not result in a design change at the plant. The schedule for their review would be submitted to NRC by June 26, 1981.

Subsequent to internal NRC discussion, BECo. was informed that the 50.44 violation would be addressed in two parts. The Office of Inspection and Enforcement, Region 1, would address the past non-compliance. It was agreed that BECo. appeared to be in compliance with the regulation since June 2, 1981 by use of the new system (BECo. 81-127, June 15, 1981). However, the Office of Nuclear Reactor Regulation would conduct a review of a detailed submittal by BECo. to assure such compliance. That submittal would be formally requested by a NRC letter to be sent during the week of June 22, 1981.



Mark H. Williams, Project Manager
Operating Reactors Branch #2
Division of Licensing

cc: w/o Encl 2
See Next Page

Enclosure 1

BECo. Meeting of June 18, 1981

NRC

M. H. Williams, NRR
T. A. Ippolito, NRR
E. Blackwood, OIE
J. Partlow, OIE

BECo.

- R. Machon
W. Merritt
A. V. Morisi
J. Fulton