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WILLIAM D. HARRINGTON
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NUCLEAR

April 15, 1982

BECO. Ltr. #82-107

Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

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

Reference (A) NRC Letter dated March 23, 1982,
IE Inspection 82-01

Subject: Inspection 50-293/82-01

Dear Sir:

This responds to items of violation contained in Reference (A), the result of a routine safety inspection conducted January 18, 1982 to February 28, 1982 at Pilgrim Nuclear Power Station.

Appendix A, Item A

10 CFR 19.12 requires that all individuals working in or frequenting any portion of a restricted area shall be kept informed of the storage, transfer, or use of radioactive materials or of radiation in such portions of the restricted area.

Station Procedure No. 6.1-022, "Radiation Work Permit", Revision 8, Section II, requires that the latest radiological survey data be posted at the work area or with the RWP. Section VI.C.9.a requires that if it becomes necessary to change dress requirements or instructions, an RWP revision sheet shall be completed showing these changes. Section VI.D.1 further requires that all persons who are to enter the work area be briefed by an HP representative on the physical and radiological conditions in the work area.

Contrary to the above, at about 8:20 a.m. on January 29, 1982, workers entering the Standby Gas Treatment Room (a restricted area) were not informed of the storage of about 100 gallons of dry radioactive spent resin. The latest radiological survey performed at 11:00 p.m. on January 28, 1982 was not posted at the work area or with the pertinent RWP covering these workers; and RWP revision sheet was not completed showing necessary changes in dress requirements; and the workers were not briefed by an HP representative on the actual physical and radiological conditions in the area.

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Response to Item A (INC 82-01-01)

Our immediate corrective action was to resurvey the area and update the RWP accordingly.

We believe that this non-compliance resulted from the unusual conditions that existed in the Standby Gas Treatment Room (SBTS) coupled with the fact that two separate RWP's covered essentially the same location. Inadequate coordination between the separate RWP's involved, and insufficient communication between personnel responsible for each RWP led to the non-compliance.

We believe this failure of communication resulted from the utilization of "ALARA" technicians to provide work coverage which is ordinarily provided by Health Physics technicians.

To preclude recurrence of this type of event, we have issued a policy memo within the Radiological Group detailing how technicians involved in H.P. and ALARA are to be utilized. It also directs that when Health Physics Supervision cannot supply coverage for the needs of the plant, an ALARA Technician may be transferred to the Health Physics Section. Instead of reporting to the ALARA Supervisor, which was the case in the subject event, the technician shall report to the on-shift Health Physics Supervisor for direction. This transfer of personnel must be approved by the Senior ALARA Engineer or Chief Radiological Engineer. We believe this policy will obviate the type of communications lapse that evolved this event.

Full compliance has been achieved.

Appendix A, Item B

Technical Specification 6.8.D requires that written procedures to implement the Fire Protection Program be established, implemented and maintained.

Pilgrim Nuclear Power Station Fire Protection Plan dated August 10, 1978, Section IV.6, specifies that the Fire Prevention and Protection Officer is responsible for inventory, inspection, and replacement of fire fighting equipment, and also requires that, after the use of this equipment during each exercise, drill, or fire emergency, that it be inspected, tested, and verified to ensure that it has been restored to its original function and capability.

Station Procedure No. 6.7-108, Operating Instructions for Breathing Air Charging System, Revision 0, requires that air bottles for ten Self Contained Breathing Apparatus (SCBA) units and twenty spares be fully charged in order to sustain ten men for six hours.

Contrary to the above, on January 28, 1982, written procedures to implement the Fire Protection Program were not established to assure an adequate inventory of fire protection equipment in that only 29 of the 30 required SCBA bottles were fully charged and only 7 of these 30 bottles had current hydrostatic test dates and could have been recharged. This was an insufficient number of rechargeable bottles to meet the 10 men for six hours self contained breathing requirements.

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Response to Item B (INC 82-01-03)

As stated in the inspector's report, thirty two (32) bottles were immediately transported to a vendor for hydrostatic testing to conform to the required OSHA and manufacturer's recommendations. This was initiated on January 28, 1982, and all the bottles were returned to Pilgrim by February 3, 1982. To prevent recurrence, revisions to Procedures 6.7-107 and 6.7-108 will be made to assure that bottles in use are tested within the required time frame. Full compliance shall be achieved by June 1, 1982.

Regarding the inventory and operability of fire fighting equipment, a new procedure shall be initiated, and a revision of Procedure 5.5.1 for post fire inventory of equipment will be instituted. Full compliance shall be achieved by June 28, 1982.

We believe these responses satisfactorily address your concerns. Should you require further information regarding them, please contact us.

Very truly yours,

William D Harrington

Commonwealth of Massachusetts)
County of Suffolk)

Then personally appeared before me William D. Harrington, who, being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company, the applicant herein, and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My Commission expires: *October 21, 1988*

Peter M. Kahler
Notary Public

