

BOSTON EDISON COMPANY *ma*
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

July 9, 1982

George H. Smith, Director
Division of Preparedness and Operational
Support
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

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Reference: Letter, George H. Smith to
William D. Harrington
dated June 22, 1982

Dear Sir:

Your letter of June 22, 1982 transmitted a report of the results of Emergency Preparedness appraisal 50-293/81-15 and requested written statements by Boston Edison describing planned actions relative to items identified in Appendices A, B, and C of your letter. The purpose of this letter is, first, to confirm the schedule for submission of written statements agreed upon by Mr. J. W. Fulton of Boston Edison, and Mr. H. W. Crocker of NRC Region I; and, second, to acquaint you with my concern with both the timeliness and nature of those items identified as "significant emergency preparedness findings" in Appendix A.

Your report, which was dated June 22, 1982, was received by Boston Edison on June 28, 1982. Boston Edison did not have an opportunity to review or comment on report content during its preparation. Consequently, Mr. Fulton spoke by telephone with Mr. Crocker and requested that the report be withheld from the Public Document Room an additional ten days to provide Boston Edison an adequate review period.

Mr. Crocker agreed to withhold the document from the Public Document Room until July 12, 1982, and also offered an additional ten days for preparation and submission of statements of planned actions. Boston Edison's statement

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describing planned actions for improving items identified in both Appendices A and B, accordingly, will be submitted on or before August 1, 1982.

Appendix A lists 20 items identified as "significant emergency preparedness findings". Because these are identified as "significant" and are identified as deficiencies which, if not corrected within 120 days, will prompt the NRC to consider enforcement action, some members of the general public, public interest groups, and the media will assume that plant operations have been conducted at reduced safety margins for nearly a year. This is clearly not the case.

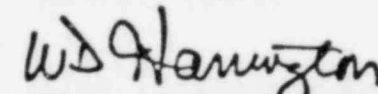
I expect that one question which will be asked is why a letter requiring correction within 120 days was not issued immediately or soon after the appraisal was completed in July 1981. Our own expectations, based upon remarks at the exit interview by emergency appraisal team members, were that a formal report would be issued within a few weeks of the appraisal, and that it would reflect few, if any, Appendix A items.

Many or most of the items listed in Appendix A do not involve systems necessary to protect the public health or safety or that of the plant personnel. We believe they could have been listed more appropriately in Appendix B.

Since last July many of the items appearing in both Appendix A and Appendix B have been addressed in the context of Boston Edison's ongoing emergency preparedness efforts. This will be reflected in the written statement Boston Edison will submit on or before August 1, 1982, and is evidenced by the results of NRC Inspection Report 50-293/82-09. This inspection was conducted March 2-3, 1982, during the conduct of a joint emergency preparedness exercise involving Pilgrim Nuclear Power Station and state and local authorities. The report indicates that within the scope of the inspection no items of noncompliance were observed. While twelve areas for improvement were described, no reply to the report was required.

Although Boston Edison will make use of the report and its analysis, we feel that the inclusion of many of the items in Appendix A is misleading and unfortunate and could lead to unwarranted public concern on these matters.

Sincerely yours,



William D. Harrington
Senior Vice President, Nuclear

WDH/mg