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J. EDWARD HOWARD
VICE PRESIDENT
NUCLEAR ENGINEERING

July 28, 1982

BECO. Ltr. #82-204

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

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

Response to Emergency Response Appraisal

References: Ltr. George H. Smith to W. D. Harrington
dated 6/22/82 (BECO. Ltr. #1.82.185)

Ltr. W. D. Harrington to George H. Smith
dated 7/9/82 (BECO. Ltr. #2.82.202)

Dear Sir:

Your letter of June 22, 1982 transmitting Emergency Preparedness Appraisal 50-293/81-15 requested submission of a written statement within 30 days describing actions Boston Edison plans to take for improving each of the items identified in Appendix A, and the results of Boston Edison's consideration of each of the items in Appendix B.

This letter, together with Attachments A and B thereto, constitutes that written statement. Attachment A describes planned actions relevant to the findings of your Appendix A; Attachment B describes the results of Boston Edison's consideration of Appendix B items.

The format of both Attachments A and B is identical. The item description is repeated, and pertinent observations are referenced, and, where appropriate, clarified. An action plan is described, including (1) actions completed, (2) actions scheduled and (3) exceptions taken by Boston Edison to the item or the observation which support it. Please note that the latest scheduled completion date for actions pursuant to Appendix A items is October 15, 1982. Mr. Harrington's letter to you dated July 9, 1982 referenced above, reports that Mr. H. W. Crocker of NRC Region I had offered Boston Edison an additional ten days for preparation and submission of statements because of delay in receipt of the Appraisal Report. I assume, therefore, that expiration of the 120 day period for confirmatory action will occur on October 30, 1982. While completion of the actions described in Attachment A is scheduled for no later than October 15, 1982, Boston Edison requests that the full 120 day period be allotted before further NRC action is considered.

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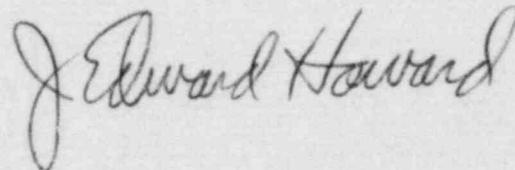
BOSTON EDISON COMPANY

Mr. George H. Smith
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Boston Edison will attempt to schedule a meeting with NRC officials early in August to discuss the Appraisal Report, this response, and the proposed approach to responding to the items described in Appendix C of the Appraisal Report. I expect that Boston Edison will respond to the Appendix C items in a manner that you will find acceptable, and that this response will be submitted on or before October 30, 1982. Prospective reorganization of Boston Edison's Nuclear Organization, and uncertainty on the part of state officials of the results of a long-awaited report by the Federal Emergency Management Agency on their findings pursuant to the March 3, 1982 exercise of off-site preparedness, may delay completion of some plan revisions. Boston Edison will review the desirability of seeking an extension for such items during the proposed August meeting with NRC officials.

Should you have questions concerning this report, please contact Mr. Robert Cunningham at (617) 848-3812.

Very truly yours,

A handwritten signature in cursive script that reads "J. Edward Howard". The signature is written in dark ink and is positioned to the right of the typed name.

Attachment

ATTACHMENT A

RESPONSE TO

EMERGENCY PREPAREDNESS APPRAISAL REPORT

APPENDIX A

"SIGNIFICANT EMERGENCY PREPAREDNESS FINDINGS"

APPENDIX A -- ITEM 1

1. Item Description

Revise the description of the onsite emergency organization to provide for all emergency functions required during the initial and augmentation phases of emergency response, to include: the minimum staffing requirements of NUREG-0654, Rev. 1, Criterion B.5; a sufficient level of detail to completely and unambiguously delineate the command hierarchy, reporting chains, and functional interrelationships down to the working level; and the relationships between normal job assignments and emergency tasks.

2. Pertinent Observations

See Section 2.1 of Appraisal Report.

3. Action Plan

a. Actions Completed

In relation to functional compliance with minimum staffing guidance for nuclear power plant emergencies (NUREG 0737 Table III A.1.2-1; NUREG 0654 Table B-1) Boston Edison submitted a response to the generic letter sent by Darrel G. Eisenhut, Director, Division of Licensing on June 1, 1981 (BECo letter 81-121). This response outlined proposed minimum staffing and listed the range of maximum response time for emergency personnel.

Boston Edison requested a response to the proposals contained in this letter and has since reiterated that request. To date, no response has been received.

The licensee continues to maintain that the emergency preparedness objectives of the referenced guidance are met by current staffing as reflected in BECo letter 81-121.

b. Actions Scheduled

Notwithstanding the above, the licensee is reorganizing its Nuclear Organization. In doing so, modifications will be made in the emergency organization. These changes will result in revisions to the PNPS Emergency Plan which will include a description of the onsite emergency organization to provide for all emergency functions required during the initial and augmentation phases of emergency response. The organization will be described in sufficient detail to completely and unambiguously delineate the command hierarchy down to the working level.

The scheduled completion date for this component is October 15, 1982.

c. Exceptions

None

APPENDIX A -- ITEM 2

1. Item Description

Identify emergency response tasks that are not part of the assigned person's normal duties and demonstrate their ability to perform these tasks during practical exercises.

2. Pertinent Observations

See Section 3.1 of the Appraisal Report.

3. Action Plan

a. Actions Completed

An integrated full-scale exercise has been held (March 3, 1981) which demonstrated the ability of personnel with assigned emergency response tasks to perform these duties.

b. Actions Scheduled

Health physics personnel have and will continue to be scheduled for Light Duty Emergency Rescue Training at the Massachusetts Civil Defense Training Academy, as such training is available.

c. Exceptions

None

APPENDIX A -- ITEM 3

1. Item Description

Provide training for offsite support agencies including:

- a. onsite and radiological training for the Plymouth Fire Department personnel and for the officers of the Kingston and Duxbury Departments;
- b. onsite and interface training for Plymouth Police personnel; and
- c. briefing of plume EPZ protective action decision makers, including fire and police officials, on protective actions as they relate to plant conditions.

2. Fertinent Observations

See Section 3.2 of the Appraisal Report.

3. Action Plan

a. Actions Completed

1. Plume exposure EPZ protective action decision makers, including fire and police officials have been briefed on protective actions as they relate to plant conditions. These briefings were conducted during the period December 1981 - January, 1982, in the context of comprehensive radiological response plan training held in all five EPZ communities and three reception communities.
2. Radiological training for fire department personnel of Plymouth, Kingston, Duxbury and other communities was provided by Massachusetts Department of Public Health officials during the training sessions referenced above.
3. On-site training for Plymouth Fire Department personnel is carried out periodically and in the context of drills/exercises. Interface training for Plymouth Police personnel is also conducted periodically. Plymouth Police do not assume Emergency Plan responsibilities on site; their training is accordingly limited to site access control and interface.

b. Actions scheduled

On-site training for officers of the Duxbury and Kingston Fire Departments has been scheduled. The scheduled completion date for this action is October 15, 1982.

APPENDIX A -- ITEM 3 (Continued)

c. Exceptions

As noted above, Plymouth Police are not assigned emergency responsibilities in the context of the Emergency Plan.

APPENDIX A -- ITEM 4

1. Item Description

Provide dedicated equipment and supplies, including communication equipment, at the AEOF as required for smooth and timely transfer of emergency operations, including command and control functions, to the AEOF, should evacuation of the primary EOF be required.

2. Pertinent Observations

See Section 3.2 of the Appraisal Report.

3. Action Plan

a. Actions completed

Dedicated equipment and supplies, including communication equipment have been placed in the AEOF. This equipment includes:

1. Area maps with standard $22\frac{1}{2}^{\circ}$ sector markings including the 10 mile and 50 mile EPZ's;
2. Thirteen telephones;
3. Radio equipment;
4. Administrative supplies including a copying machine;
5. Emergency notification lists.

The equipment at the AEOF, which was put in place prior to March 1, 1982 will provide for the smooth and timely transfer of emergency operations should evacuation of the primary EOF be required.

b. Actions Scheduled

None.

c. Exceptions

None.

APPENDIX A -- ITEM 5

1. Item Description

Review emergency plans and procedures for handling liquid wastes generated before and as a result of an accident, to clarify the scheme of handling these liquids, to identify the situations when liquid sampling and analysis would be necessary, and to provide for the required equipment sampling, and analytical procedures.

2. Pertinent Observations

See Section 4.1.1.8 of The Appraisal Report.

3. Action Plan

a. Actions Completed

None

b. Actions Scheduled

The existing procedures which address the handling, sampling and analyses of liquid radwaste will be reviewed to determine applicability to Post-Accident operations.

Due to variety of transients which could result in some quantities of high or low level liquid waste, it is not possible to proceduralize all possible treatment options available to Plant Operators. For example, quantities of waste which do not exceed the volume or radioactivity design limits of existing plant radwaste systems would be handled and treated as routine liquid waste. Higher level wastes or larger than expected quantities may require supplementary radwaste treatment equipment and the services of contractor personnel.

By plant design, following a severe accident all high level radioactive liquid would be confined to the drywell and torus and would be treated on a controlled basis at some time after the plant had been secured and after any high radiation levels had decayed to tolerable levels.

As a result of this review, as necessary, the scheme for handling liquid wastes generated before or as a result of an accident will be clarified. This action will be completed by October 15, 1982.

c. Exceptions

None

APPENDIX A -- ITEM 61. Item Description

Evaluate the availability of facilities and resources in the vicinity of the site which could be used for the administrative and logistical support by the expanded support organization (corporate, contractor and nonlicensee personnel) in the event of a large-scale response to an emergency situation, and incorporation of such facilities into the Emergency Plan and implementing procedures.

2. Pertinent Observations

See Section 4.1.3 of The Appraisal Report.

3. Action Plana. Actions Completed

A procedure was implemented in February, 1982 institutionalizing the position of Manpower Coordinator as a part of the on-site emergency response organization. Included in the responsibilities of this position is coordinating administrative and logistical support arrangements. This mechanism has strengthened arrangements that existed during the appraisal period.

b. Actions Scheduled

None.

c. Exceptions

Boston Edison had at the time of the appraisal, the capability to identify necessary facilities and resources during an emergency. This capability is demonstrated during emergencies unrelated to PNPS, in the context of actions carried out under the Company's generic plan for conducting major emergency operations. Boston Edison also works closely with the Massachusetts Civil Defense Agency, which coordinates the availability of all necessary facilities and resources on behalf of the Governor following a declaration of emergency. Listings of key available facilities are maintained by the District Manager at PNPS, and in the EOF.

APPENDIX A -- Item 7

1. Item Description

Provide dedicated instruments and supplies needed for operations of the OSC or assure through a system of management controls that such instruments and equipment are maintained at or above established minimum inventory levels and are available and operable for emergency use.

2. Pertinent Observations

See Section 4.2.11 of The Appraisal Report.

The appraisal observations were directed toward the absence of dedicated health physics equipment in the OSC.

3. Action Plan

a. Actions Completed

1. Dedicated health physics instruments and supplies were placed in the OSC in February, 1982.
2. PNPS Procedure 5.8.2 "Emergency Facilities and Equipment Audits", was revised to assure that this equipment is maintained at or above established minimum inventory levels, and that it is available and operable for emergency use.

b. Actions Scheduled

None

c. Exceptions

None

APPENDIX A -- Item 8

1. Item Description

Re-evaluate the emergency response needs for SCBA devices and provide sufficient, appropriately dedicated SCBA equipment, including spare tanks for emergency use.

2. Pertinent Observations

See Section 4.2.2.1 of The Appraisal Report.

3. Action Plan

a. Actions Completed

The re-evaluation of emergency response needs for SCBA devices has been completed.

b. Actions Scheduled

Boston Edison is procuring 23 one-hour SCBA packs and 46 one-hour SCBA bottles. When this equipment has been placed in service, approximately 12 half-hour units will be dedicated to emergency response needs. Dual use of new equipment, together with the dedicated equipment, will assure adequate SCBA capability. The in-service date of this additional equipment is dependent upon vendor availability, however, a purchase order will be issued prior to 9-1-82.

c. Exceptions

None

APPENDIX A -- Item 9

1. Item Description

Evaluate the equipment needs including SCBA devices for supporting repair and corrective action teams and the positioning of this equipment at specified locations for emergency use by the teams.

2. Pertinent Observations

See Section 4.2.4 of The Appraisal Report

3. Action Plan

a. Action Completed

1. Dedicated health physics equipment has been placed in the OSC (see response to item 7).
2. The evaluation of equipment needs, including SCBA devices has been completed.

b. Actions Scheduled

Boston Edison is procuring additional SCBA equipment (See response to Item 8).

c. Exceptions

The licensee continues to maintain that the equipment needs for supporting repair and corrective action personnel are best met from stockpiles of equipment and supplies available at multiple locations outside of process buildings.

APPENDIX A -- ITEM 10

1. Item Description

Evaluate the availability of vehicles, appropriate for various climatic and road conditions, equipped with appropriate radio communications for use during emergencies by monitoring teams and assure that such vehicles will be readily available for emergency use.

2. Pertinent Observations

See Section 4.2.6 of The Appraisal Report.

3. Action Plan

a. Actions Completed

1. The evaluation of vehicle and mobile communications capability for monitoring teams has been completed.
2. Ten four-wheel drive vehicles have been ordered for emergency response assignments. Mobile transceivers for each vehicle have been ordered.

b. Actions Scheduled

Two vehicles will be assigned to support recovery organization needs at Braintree. Eight will be stationed at PNPS. The majority will be assigned to key emergency response personnel who are on 24 hour call via beeper. The procurement of these ten vehicles will assure adequate radio-equipped transport for monitoring teams. The scheduled completion date for this action is October 15, 1982.

c. Exceptions

None.

APPENDIX A -- ITEM 11

1. Item Description

Provide EAL's which address all the pertinent Initiating Conditions contained in Appendix 1 of NUREG 0654 and include specific and observable control room instrument readings for each EAL corresponding to the respective Initiating Conditions.

2. Pertinent Observations

See Section 5.2.2 of The Appraisal Report.

3. Action Plan

a. Actions completed

Boston Edison reviewed EAL's with NRC personnel (Thomas McKenna) during the appraisal and over the course of the following several months. EAL's were revised as a result of these discussions. It is the understanding of Boston Edison that the revision incorporated into the PNPS procedures on February 26, 1982 (PNPS Procedures No. 5.7.1.1 - 5.7.1.5) and exercised on March 3, 1982, addresses all pertinent initiating conditions contained in Appendix 1 of NUREG 0654 and includes appropriate specific and observable control room instrument readings.

b. Actions Scheduled

None.

c. Exceptions

The appraisal report lists a number of deficiencies relative to either a failure to address a specific initiating condition, or a failure to provide specific and observable EAL's. The licensee believes that in most cases the initiating conditions listed were not pertinent to PNPS, or the EAL's not appropriate.

It is Boston Edison's position that NRC's concurrence in existing EAL's and their acceptance during the March 3, 1982 exercise supports this position.

APPENDIX A -- ITEM 12

1. Item Description

Revise the offsite notification procedures to specify protective action recommendations in the notification messages, and reconcile contradictory messages.

2. Pertinent Observations

See Section 5.4.1 of The Appraisal Report.

3. Action Plan

a. Actions Completed

PNPS Procedure Number 5.7.2.8, "Control Room Emergency Communicator," was revised to specify consistent protective action recommendations in the notification messages. This procedure was approved on February 26, 1982. For the General Emergency Classification, all notifications made via this procedure include a recommended protective action for the general public within a 5 mile radius of PNPS to remain indoors.

b. Actions Scheduled

None.

c. Exceptions

None.

APPENDIX A -- ITEM 13

1. Item Description

Expand the assessment scheme to include post-accident sample results and provisions to project offsite dose rates or doses if effluent monitors are offscale or inoperable.

2. Pertinent Observations

See Section 5.4.2 of Appraisal Report

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

None.

c. Exceptions

The offsite dose assessment methods used rely on two mechanisms to estimate offsite dose rates. The first makes use of effluent radiation monitor readings and measured meteorological parameters which are used to estimate release rates, atmospheric dispersion and ultimately offsite dose rates. The second is the use of field survey team data which provides actual measured dose rates in the environment. If effluent monitors are offscale or inoperable the results of the actual field team measurements would be used.

Post accidents sample results from the containment atmosphere are not a valid parameters on which to estimate offsite effects. Many processes influence the quantity and composition of the effluent after it leaves the containment. Factors such as plateout and deposition in the drywell and reactor building, mixing in the reactor building atmosphere, filtering effects in the drywell and reactor building leakage paths, and drywell pressure and actual drywell leak rate will cause any estimates of offsite effects based solely on drywell sample results to be extremely inaccurate and possibly severely distorted.

The results of post-accident effluent monitoring and/or sampling at the Main Stack, Reactor Building Vent and Turbine Building can be input directly into the offsite dose estimates. Procedure 5.7.2.22, "Offsite Dose Rate Nomograms" includes calculational aids that allow an operator to input release rates of noble gases and halogens directly (if known from sampling) and thereby eliminate the need for effluent monitor readings.

APPENDIX A -- ITEM 14

1. Item Description

Provide recommended protective actions based on actual and projected core/containment conditions and offsite factors which may impact on the effectiveness of the recommendations and consider the near site population.

2. Pertinent Observations

See Section 5.4.2 of Appraisal Report.

3. Action Plan

a. Actions Completed

Present practice and procedures provide for recommending protective actions to State authorities based on actual and projected core/containment conditions. These recommendations are provided to Department of Public Health representatives at the EOF by the Emergency Director. The capability to develop these recommendations and interact with the Department of Public Health was successfully demonstrated during the March 3, 1982 exercise.

b. Actions Scheduled

Procedure 5.7.2.18 will be revised to include guidance on developing and conveying recommended protective actions to State authorities which will be based upon projected core/containment conditions. This action will be completed by October 15, 1982.

c. Exceptions

Boston Edison has worked closely with State Public Health and Civil Defense officials in developing mechanisms for generating protective action recommendations. The State Plan provides that the Department of Public Health will determine which action is appropriate based upon licensee advice of core/containment condition, and State Civil Defense advice of weather, road/traffic conditions, special population requirements, etc. The licensee is precluded from making such determinations by State plan provisions and a lack of knowledge on off-site conditions.

APPENDIX A -- ITEM 15

1. Item Description

Incorporate onsite monitoring capability into the Emergency Plan and procedures to include the required survey maps, instrumentation, and assignment of personnel.

2. Pertinent Observations

See Section 5.4.2.2 of Appraisal Report.

3. Action Plan

a. Actions Completed

1. PNPS procedure no. 5.7.2.2, "Radiation Emergency Team Coordinator", was revised to instruct the on-shift Health Physics Technician to report to the Watch Engineer following a declaration of an emergency on a back shift. The Watch Engineer's instructions may be to perform a specific survey (e.g., on-site), report to the OSC or report to the EOF. This revision was implemented prior to March 1, 1982.
2. A full set of site survey maps is maintained in the plant Health Physics office adjacent to the OSC. A second full sets of maps has been located in the EOF. This set was put in place prior to March 1, 1982.
3. Dedicated health physics instrumentation is maintained in the EOF, OSC and TSC. This equipment was put in place prior to March 1, 1982.
4. The equipment available in the TSC for use by the on-site Health Physics Technician in conducting on-site surveys includes radioiodine monitoring capability.

b. Actions Scheduled

A SAM-II unit currently located in the TSC will be added to the TSC inventory (PNPS Procedure 5.8.2). This action will be completed by October 15, 1982.

c. Exceptions

None.

APPENDIX A --Item 16

1. Item Description

Incorporate in-plant survey capability into the Emergency Plan and procedures to include the necessary survey forms, high radiation precautions, protective equipment, instruments, and assignment of personnel.

2. Pertinent Observations

See Section 5.4.2.3 of Appraisal Report.

The pertinent observation, "However, there were no procedures developed for conducting in-plant surveys" was erroneous. PNPS operating Procedures, Volume 6, "Health Physics" includes detailed procedures for the conduct of in-plant surveys.

3. Action Plan

a. Actions Completed

None

b. Actions Scheduled

None

c. Exceptions

As noted above, detailed procedures for the conduct of in-plant surveys are in place. Further, the following PNPS procedures address the conduct of such surveys under emergency conditions: 5.7.1.0 "Description of Emergency Organization and Facilities"; 5.7.2.2 "Radiation Emergency Team Coordinator"; 5.7.2.4 "Operations Support Center Supervisor"; and 5.7.2.16 "Re-Entry".

APPENDIX A --ITEM 17

1. Item Description

Develop monitoring and decontamination procedures that include decontamination action levels as a function of background and instruments; potentially contaminated persons; and include the reassembly area.

2. Pertinent Observations

See Section 5.4.3.4 of Appraisal Report.

3. Action Plan

a. Actions Completed

PNPS Procedure Numbers 5.7.2.2, "Radiation Emergency Team Coordinator", 5.7.2.12, "Yellow Personnel Monitoring Team," and 5.7.2.13, "Brown Personnel Monitoring Team," were recently revised to include decontamination action levels as a function of background and instruments. These procedure revisions were completed prior to July 1, 1982.

b. Actions Scheduled

PNPS Procedure Numbers: 5.7.2.2, "Radiation Emergency Team Coordinator", 5.7.2.12, "Yellow Personnel Monitoring Team," and 5.7.2.13, "Brown Personnel Monitoring Team", will be revised to address the decontamination of large groups of contaminated individuals, as well as the decontamination of vehicles. These revisions are expected to be completed by October 15, 1982.

c. Exceptions

None.

APPENDIX A --ITEM 18

1. Item Description

Develop procedures for use during emergencies which describe the concept of operations of the emergency repair and corrective action teams, including reporting chains and precautions appropriate for the situation.

2. Pertinent Observations

See Section 5.4.5 if the Appraisal Report.

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

A change to PNPS Procedure 5.7.2.16 "Re-Entry" will be implemented. The revised procedure will provide that radiation levels will be monitored continuously during the performance of emergency repairs or corrective actions. This change will be completed by October 15, 1982.

c. Exceptions

Boston Edison believes that the concept of operations for the conduct of emergency repair and corrective actions are fully described in the following procedures: 5.7.2.16 "Re-entry"; 5.7.1.0 "Description of Emergency Organization and Facilities"; 5.7.2.1 "Emergency Director"; and 5.7.2.2 "Radiation Emergency Team Coordinator".

APPENDIX A -- ITEM 19

1. Item Description

Develop coordination between the PNPS site and the NRC to assure appropriate interface of the respective emergency organizations during an emergency.

2. Pertinent Observations

See Section 6.1 of The Appraisal Report.

3. Action Plan

a. Actions Completed

A number of discussions and meetings have been held with NRC personnel during development of the licensee's Emergency Plan. This coordination has resulted in allocation of space in licensee facilities for NRC emergency response personnel, provision of dedicated telephones for NRC use, and other arrangements.

b. Actions Scheduled

Arrangements are being made at the time of this response for a meeting between licensee and NRC Region I personnel to explore areas where further coordination may be necessary. This action is scheduled for completion by August 15, 1982.

c. Exceptions

None.

APPENDIX A -- ITEM 20

1. Item Description

Provide dissemination and posting of site-specific emergency response information to the public, including all segments of the plume EPZ transient population (beach, motel, etc.) in a form that is likely to be available in the event of an emergency, and which includes a discussion of the relationship of accidents to protective actions and improvised methods for obtaining respiratory protection.

2. Pertinent Observations

See Section 6.2 of Appraisal Report.

3. Action Plan

a. Actions Completed

A site-specific emergency public information brochure was prepared by State authorities with licensee support. Copies were mailed to all addressees in the EPZ, and stockpiles for distribution to motels, public buildings, etc. were made available to local official.

b. Actions Scheduled

1. The above referenced booklet, and a booklet entitled "Nuclear Power -- Questions and Answers" will be redistributed throughout the EPZ.
2. An emergency public information poster is being developed. It will be made available to local officials for posting in public places.

These actions will be completed by October 15, 1982.

ATTACHMENT B

RESPONSE TO

EMERGENCY PREPAREDNESS APPRAISAL REPORT

APPENDIX B

"EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS"

APPENDIX B -- ITEM 1

1. Item Description

Revise the Position Descriptions for the site Emergency Planning Coordinator and his assistants to reflect the actual performance of emergency preparedness functions.

2. Pertinent Observations

[See Section 1.1 of Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

Once the final nuclear organization structure is determined the position descriptions of key emergency personnel will be reviewed, and, where necessary, a descriptive paragraph plus an appropriate accountability statement will be added. The scheduled completion date for this action is January 1, 1983.

c. Exceptions

None.

APPENDIX B -- ITEM 2

1. Item Description

Establish selection/qualification criteria for key personnel responsible for emergency planning (e.g., corporate and site EPCs).

2. Pertinent Observations

[See Section 1.4 of the Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

Once the final nuclear organization is determined the position descriptions of key emergency personnel will be reviewed, and, where necessary, the selection/qualification criteria will be modified. The modification will, where appropriate, ensure that the relative knowledge, skills, and ability required for the position are clearly delineated within the position description. The scheduled completion date for this action is January 1, 1983.

c. Exceptions

None.

APPENDIX B -- ITEM 3

1. Item Description

Develop training programs to enable the corporate and site EPCs to meet qualification criteria and maintain a state-of-the-art knowledge of emergency planning matters.

2. Pertinent Observations

[See Section 1.4 of the Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

The Nuclear Training Department will develop training programs for the corporate and site emergency preparedness personnel when qualification criteria for these personnel has been established. (See response to Item 2.)

c. Exceptions

None.

APPENDIX B -- ITEM 4

1. Item Description

Resolve conflicts in the notification responsibilities of the BECO Recovery Organization and the Emergency Director.

2. Pertinent Observations

[See Section 2.2 of the Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

None.

c. Exceptions

The prime responsibility of notifying various governmental agencies rests with the Emergency Director. The notifications made by the Recovery Organization to various governmental agencies is confirmatory in nature. These arrangements were explained to the auditors, to their apparent satisfaction.

APPENDIX B -- ITEM 5

1. Item Description

Ensure that training/retraining of emergency response personnel is conducted on major changes in emergency equipment, facilities and procedures prior to their implementation.

2. Pertinent Observations

[See Section 3.1 of the Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

The Emergency Preparedness Coordinator will work with the Nuclear Training Department to improve arrangements to identify major changes to emergency equipment, facilities and procedures which require training prior to their implementation, and ensure that such training is provided. The scheduled completion date for this action is September 20, 1982.

APPENDIX B -- ITEM 6

1. Item Description

Include the Recovery Organization training in the PNPS Training Manual.

2. Pertinent Observations

[See Section 3.1 of the Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

Recovery Organization training will be incorporated into the Nuclear Training Manual. The scheduled completion date for this action is December 31, 1982.

c. Exceptions

None.

APPENDIX B -- ITEM 7

1. Item Description

Provide annual training of general employees on their response during radiological emergencies to include expected conditions during emergencies, protective actions, locations of remote assembly areas and site evacuation.

2. Pertinent Observations

[See Section 3.1 of the Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

The PNPS General Employee Training (GET) Program is currently in the process of revision. The revised GET program will address the concerns listed in the item. The scheduled completion date for this action is July 31, 1983.

c. Exceptions

This Appraisal Report states that "...the training did not discuss the actions plant personnel should take if an evacuation of the site was required." Contrary to this observation, General Employee Training does discuss actions plant personnel should take in the event an evacuation of the site is required.

APPENDIX B -- ITEM 8

1. Item Description

Ensure that all personnel who are assigned emergency functions, have been trained/qualified for those functions prior to their assignment on the emergency rosters.

2. Pertinent Observations

[See Section 3.2 of the Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

The PNPS Emergency Plan roster is updated on a quarterly basis. The Emergency Preparedness Coordinator will notify the Nuclear Training Department of all impending changes to the roster prior to the actual change. Personnel will not be activated on the roster until the Emergency Preparedness Coordinator has verified that necessary training has taken place. The scheduled completion date for this action is October 1, 1982.

Appendix B -- ITEM 9

1. Item Description

Provide clear access to the area map in the Control Room and for a map with standard directional sector and plume EPZ markings.

2. Pertinent Observations

[See Section 4.1.1.1 of the Appraisal Report]

The Appraisal Team assumption that the map in question, in the Control Room, is intended for emergency response functions is not warranted.

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

None.

c. Exceptions

The area map in the Control Room is for the personal use of the operators and is not intended for emergency response. The offsite dose calculational aids determine the affected sector for any releases of radioactive materials and Emergency Plan Implementing Procedures contain copies of all maps necessary for offsite survey.

APPENDIX B -- ITEM 10

1. Item Description

Provide KI in the Control Room.

2. Pertinent Observations

[See Section 4.1.1.1 of the Appraisal Report]

3. Action Plan

a. Action Completed

None.

b. Actions Scheduled

None.

c. Exceptions

The Control Room's ventilation system air supply goes through a 95% efficient charcoal filtration system. Based upon a control room habitability study conducted in accordance with item II.B.2 of NUREG 0737 the maximum thyroid dose to a control room operator during a design basis loss-of-coolant accident is 5.3 rem over a 30-day period. Therefore, it is not necessary that KI be stored in the Control Room because 10 CFR Part 50, Appendix A, states that Control Room personnel thyroid exposures are to be limited to 30 rem. This position is in keeping with recent FDA guidance of KI administration for potential exposures of 25 rem or more.

APPENDIX B -- ITEM 11

1. Item Description

Relocate the interim TSC to a location providing adequate space and work environment.

2. Pertinent Observations

[See Section 4.1.1.2 of Appraisal Report]

3. Action Plan

a. Actions Completed

An interim TSC is maintained within the protected area.

b. Actions Scheduled

A TSC will be developed within the new Administrative Services Building currently being designed. The new TSC will be completed by the end of the first quarter of 1984. This facility will meet the requirements negotiated with NRC Region I personnel which will be conducted upon finalization of Secy 82-111. (Completion contingent upon local licensing approvals.)

c. Exceptions

None.

APPENDIX B -- ITEM 12

1. Item Description

Reduce the noise levels in the Emergency Director's EOF work area.

2. Pertinent Observations

[See Section 4.1.1.4 of Appraisal Report]

3. Action Plan

a. Actions Completed

The Emergency Director's work area in the EOF (Environmental Assessment Trailer) has since been modified which resulted in significantly reduced background noise levels. Modifications included the installation of an accoustical tile ceiling and heavy pile carpeting. The modifications were completed prior to March 1, 1982.

b. Actions Scheduled

None.

c. Exceptions

None.

APPENDIX B -- ITEM 13

1. Item Description

Provide detailed road maps in the EOF for aid in field monitoring team direction.

2. Pertinent Observations

[See Section 4.1 of the Appraisal Report.]

3. Action Plan

a. Actions Completed

Detailed road maps were purchased and placed in each of the field monitoring kits which are located in the Emergency Equipment Storage Room at the EOF. The actions were completed by March 1, 1982.

b. Actions Scheduled

More road maps will be purchased and put into the Emergency Equipment Storage Room in the EOF. The scheduled completion date for this action is October 15, 1982.

c. Exceptions

None.

APPENDIX B -- ITEM 14

1. Item Description

Evaluate the use of the Training Building for an onsite assembly area for non-essential personnel.

2. Pertinent Observations

[See Section 4.1.2.1 of Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

Procedures 5.7.2.7 (Emergency Security Coordinator) and 5.7.2.21 (Emergency Assembly Areas) will be changed to reflect the I & S (Training) Building as the onsite assembly area. The scheduled completion date for this action is October 15, 1982.

c. Exceptions

None.

APPENDIX B -- ITEM 15

1. Item Description

Relocate the assembly monitoring area for the shorefront area evacuees beyond the immediate area of the plant and relocate the reassembly area for plant non-essential personnel (Route 3A and Rocky Hill Road) to an area beyond the immediate area of the plant that will not interfere with response activities or dismissal of these personnel so they can be integrated into the off-site evacuation/protective action plans.

2. Pertinent Observations

[See Section 4.1.2.1 of Appraisal Report]

The Appraisal Report observation that non-essential personnel were to evacuate, following monitoring, to the junction of Route 3A and Rocky Hill Road is erroneous. Personnel will be either dismissed to go home and be assimilated with the general population, or directed to the Emergency Operations Facility.

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

Boston Edison will meet with state and local authorities to mutually identify areas where alternate assembly may be feasible, and suitably modify relevant procedures. The scheduled completion date for this action is March 1, 1983.

c. Exceptions

- 1) The primary assembly monitoring area for the shorefront area evacuees will remain unchanged as it is the most accessible and controlled area available.
- 2) As noted above, alternate assembly of non-essential personnel at the junction of Route 3A and Rocky Hill Road is not a part of PNPS procedures.

APPENDIX B -- ITEM 16

1. Item Description

Clean and provide essential supplies at the medical facility at the EOF and correct the drainage problem in the decontamination showers.

2. Pertinent Observations

[See Section 4.1.2.2]

3. Action Plan

a. Actions Completed

All essential supplies necessary for emergency medical treatment have been put in place at the medical facility at the EOF. According to PNPS Procedure No. 5.8.2, "Emergency Facilities and Equipment Audits", these supplies are inventoried quarterly by the Physician's Assistant assigned to Pilgrim Station. The Physician's Assistant also ensures the facility is maintained for immediate activation during an emergency which includes proper cleanliness. The above steps were implemented prior to March 1, 1982.

The drain system for the decontamination showers was inspected with both showers operating. The water build-up was not found to be excessive and the drain system was determined to be adequate.

b. Actions Scheduled

None.

c. Exceptions

None.

APPENDIX B -- ITEM 17

1. Item Description

Provide supplies and equipment for decontaminating personnel at reassembly areas and for vehicles prior to their release from the Pilgrim site.

2. Pertinent Observations

[See Section 4.1.2.3 of the Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

Procedure numbers 5.7.2.12 "Yellow Personnel Monitoring Team", 5.7.2.13 "Brown Personnel Monitoring Team" and 5.7.2.2 "Radiation Emergency Team Coordinator" will be changed, in the DISCUSSION section, to include consideration of the use of fire fighting equipment (either PNPS or off-site agency) to decontaminate vehicles and/or a large group of people. The change will also consider controlling the run-off and control of the area radiologically. The scheduled completion date for this action is December 31, 1982.

c. Exceptions

The First Aid and Decontamination Trailer at the EOF was designed to provide for personnel decontamination. Better supervision and control can be established there than at the reassembly areas because the trailer is better equipped for decontamination procedures. Providing decon supplies in the monitoring kits would make them extremely cumbersome.

APPENDIX B -- ITEM 18

1. Item Description

Provide adequate supplies in emergency kits in centers to meet the needs during an emergency to include sufficient numbers of self-reading dosimeters and TLDs for emergency response personnel and personnel responding from off-site to the centers; procedures at the HP Control Point; and means of airborne radioiodine detection and measurement within the security perimeter.

2. Pertinent Observations

[See Section 4.2.1.1 of the Appraisal Report]

3. Action Plan

a. Action Completed

None.

b. Actions Scheduled

A procedure change will be submitted to include in PNPS Procedure 5.8.2 "Emergency Facilities and Equipment Audits" a SAM-II for the TSC, an AMS-3 for the OSC, and approximately 40 TLDs for the EOF. This will ensure adequate supplies are maintained in emergency response centers. The scheduled completion date for this action is October 15, 1982.

c. Exceptions

- 1) The OSC and EOF have sets of PNPS procedures, therefore, procedures at the HP Control Point are not required.
- 2) The practical operating plan for personnel dosimetry is to utilize the TLDs and dosimeters that are normally issued to permanently badged individuals assigned to Pilgrim Station negating the need for a large number of dedicated emergency dosimetry devices.

APPENDIX B -- ITEM 19

1. Item Description

Resolve detector siting and exposure deficiencies in the meteorological program consistent with the criteria set forth in Regulatory Guide 1.23 and good engineering practice.

2. Pertinent Observations

[See Appraisal Report Section 4.2.1.4]

3. Action Plan

a. Actions Completed

Considerable amounts of foliage have already been removed from around the base of the 220 ft. meteorological tower.

b. Actions Scheduled

Additional trimming will be completed prior to October 15, 1982. Continual monitoring of the foliage growth will be conducted by the Environmental and Radiological Health and Safety Group.

c. Exceptions

None.

APPENDIX B -- ITEM 20

1. Item Description

Identify and incorporate techniques into the dose calculation methodology to compensate for the potential uncertainties associated with plume trajectories as a result of the influence of terrain effects.

2. Pertinent Observations

[See Appraisal Report Section 4.2.1.4]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

Procedures 5.7.2.22, 5.7.2.23 and 5.7.2.25 will be revised to direct the recommendation for protective actions for certain downwind directions to include not only the affected sector but also any potentially affected adjacent sectors into which a radioactive plume might be transported as a result of terrain effects. The scheduled completion date for this action is January 1, 1983.

c. Exceptions

None.

APPENDIX B -- ITEM 21

1. Item Description

Provide dedicated voice communication links between the OSC and the Control Room and between the OSC and the TSC, and provide readily available radio equipment for use by the OSC staff.

2. Pertinent Observations

[See Section 4.2.3 of the Appraisal Report]

3. Action Plan

a. Actions Completed

A dedicated communication link between the TSC, OSC and Control Room was installed and was operational by March 3, 1982. Each of the dedicated telephones has an externally mounted beehive-type flashing light and an externally mounted speaker box.

b. Actions Scheduled

None.

c. Exceptions

PNPS Operations Manual Procedure Number 2.2.17, "Communications System", under Section IV, "Precautions," states: "The walkie-talkies may cause erratic behavior of the neutron monitoring system which could cause a scram. Therefore, they should only be used within the Reactor Building or Control Room under controlled conditions." Hence, walkie-talkies or other portable radios will not be provided to the OSC.

APPENDIX B -- ITEM 22

1. Item Description

Provide phone numbers for the onsite emergency centers in the offsite emergency monitoring kits and to the switchboard operator.

2. Pertinent Observations

[See Section 4.2.3 of the Appraisal Report]

3. Action Plan

a. Actions Completed

Controlled copies of the PNPS Emergency Notification List were included in each of the emergency monitoring kits on July 27, 1981. Both switchboard operator stations at PNPS (Administration Building and Main Gate) were provided with a listing of the PNPS Emergency Response Facilities telephone numbers by July 19, 1982.

b. Actions Scheduled

None.

c. Exceptions

None.

APPENDIX B -- ITEM 23

1. Item Description

Review each of the alarm, abnormal occurrence, and emergency operating procedures and for those which lend themselves to ready classification, incorporate initial emergency classification statements into the procedures.

2. Pertinent Observations

[See Section 5.2.1 of the Appraisal Report]

3. Action Plan

a. Actions Completed

A job aid consisting of a chart identifying a particular event versus emergency classification and specific initiating conditions was made available to the Control Room, TSC and EOF on March 3, 1982. At the present time, this chart is not a controlled document.

b. Actions Scheduled

The above mentioned job aid will be made a controlled document, and will be available in the Control Room, TSC, EOF, and Recovery Center. The scheduled completion date for this action is October 15, 1982.

Currently the emergency operating procedures at PNPS are undergoing extensive review and revision. These procedures will be symptom-oriented rather than event-oriented. Therefore, during the review and revision process, reference will be made to PNPS Procedure Number 5.7.1.1, "Emergency Categories and Associated Emergency Action Levels." The scheduled completion date for this action is April 1, 1983.

The alarm and abnormal occurrence procedures will also be revised to reference PNPS Procedure Number 5.7.1.1, "Emergency Categories and Associated Action Levels." The scheduled completion date for this action is January 1, 1983.

c. Exceptions

With the use of the job aid as a controlled document and specific reference made to PNPS Procedure Number 5.7.1.1, "Emergency Categories and Associated Emergency Action Levels", in the revision of the alarm, abnormal occurrence and emergency operating procedures, it is expected that events will be properly and promptly classified. Revision of the latter procedures will not be necessary.

APPENDIX B -- ITEM 24

1. Item Description

Develop and implement a system for use by the control room staff to aid in promptly classifying events.

2. Pertinent Observations

[See Section 5.2.1 of the Appraisal Report]

3. Action Plan

a. Actions Completed

A job aid consisting of a chart identifying a particular event versus emergency classification and specific initiating conditions was made available to the Control Room, TSC and EOF on March 3, 1982. At the present time, this chart is not a controlled document.

b. Actions Scheduled

The above mentioned job aid will be made a controlled document and will be available in the Control Room, TSC, EOF and Recovery Center. The scheduled completion date for this action is October 15, 1982.

c. Exceptions

None.

APPENDIX B -- ITEM 25

1. Item Description

Revise the dose projection procedures to include the uncertainties associated with wind direction; estimation of release durations; impact of transport time and plume centerline location; and trend analyses of assessment data.

2. Pertinent Observations

[See Section 5.4.2 of the Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

- 1) The dose projection procedure will be revised as described in the response to item B-25 to account for uncertainties in plume trajectory and direction.
- 2) Transport time is automatically calculated by the HP-85 offsite dose calculator as described in procedure 5.7.2.25 and will be added to procedure 5.7.2.22 and 5.7.2.23. The scheduled completion date for these action is March 1, 1983.

c. Actions Completed

- 1) Procedure 5.7.2.22 adequately addresses the issue of release duration. Information on estimates of release duration are obtained from the Watch Engineer. If such estimates are not available, the 5% non-exceedance wind persistence probability for the affected sector is used to estimate offsite exposure duration.
- 2) Plume centerline location is irrelevant to the issue of offsite dose projection other than to identify the affected sector.
- 3) Trend Analysis of assessment data is implicitly assured by the availability of fast, convenient and reliable offsite dose assessment calculational aids which allow an environmental assessment engineer to make rapid and repeated estimates of offsite dose rates and doses.

APPENDIX B -- ITEM 26

1. Item Description

Provide labels for each sample that include all the information necessary for subsequent analysis and use of results.

2. Pertinent Observations

[See Section 5.4.2.1 of Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

None.

c. Exceptions

The Environmental Data Sheets and instructions current utilized by monitoring teams for identifying samples adequately record the information necessary for subsequent analysis and use of the results.

APPENDIX B -- ITEM 27

1. Item Description

Revise the communication procedures to ensure correct transmission.

2. Pertinent Observations

[See Section 5.4.3.3 of Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

The following PNPS Procedures will be revised to ensure that transmissions from the field teams to the EOF will be repeated:

- 5.7.2.9 Red Environmental Monitoring Team
- 5.7.2.10 Blue Environmental Monitoring Team
- 5.7.2.11 Green Environmental Monitoring Team
- 5.7.2.12 Yellow Personnel Monitoring Team
- 5.7.2.13 Brown Personnel Monitoring Team

The scheduled completion date for these actions is October 15, 1982.

c. Exceptions

None.

APPENDIX B -- ITEM 28

1. Item Description

Provide further drills/training to reduce the time to accomplish accountability.

2. Pertinent Observations

[See Section 5.4.3.3 of the Appraisal Report]

3. Action Plan

a. Actions Completed

On March 3, 1982, Pilgrim Nuclear Power Station (PNPS) conducted its Annual Joint Emergency Plan Exercise. During this Exercise, full personnel accountability was achieved by Security in 27 minutes. At that time, PNPS was undergoing major modifications during an outage, and the normal complement of personnel was augmented by large numbers of contractors.

b. Actions Scheduled

Personnel accountability will continue to be an integral part of various drills/exercises at PNPS.

c. Exceptions

None.

APPENDIX B -- ITEM 29

1. Item Description

Include the first-aid supplies, instruments, equipment, precautions, and dosimetry used for handling and treating contaminated injured personnel in the Medical Procedures.

2. Pertinent Observations

[See Section 5.4.3.5 of the Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

None.

c. Exceptions

First-aid supplies, instruments, equipment and dosimetry are listed in PNPS Procedure 5.8.2 "Emergency Facilities and Equipment Audits". Precautions, procedures, etc. for handling and treating injured contaminated personnel are covered by 5.6.1 "Medical Treatment". Both HP and Medical personnel are cross-trained in the provisions of both procedures.

APPENDIX B -- ITEM 30

1. Item Description

Clarify in the recovery procedures and Emergency Plan, the organizational authority responsible for the decision to enter the recovery phase.

2. Pertinent Observations

[See Section 5.4.6 of the Appraisal Report]

3. Action Plan

a. Actions Completed

PNPS Procedure Number 5.7.2.1, "Emergency Director", NOSD Procedure Number 23.02, "Recovery Manager", and other applicable NOSD procedures were revised as of March 1, 1982 specifying that it is the joint responsibility of the Emergency Director and the Recovery Manager to decide to enter the recovery phase.

b. Actions Scheduled

None.

c. Exceptions

None.

APPENDIX B -- ITEM 31

1. Item Description

Include the generator gasoline supply in the inventory procedures.

2. Pertinent Observations

[See Section 7.2.4 of the Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

PNPS Procedure 5.8.2 "Emergency Facilities and Equipment Audits" will be revised to reflect an adequate gasoline inventory. The scheduled completion date for this action is October 15, 1982.

c. Exceptions

None.

APPENDIX B -- ITEM 32

1. Item Description

Revise Procedure 5.8.1, "Drills and Exercises," to define the scope of the annual exercise, to provide for backshift drills, and to provide for submitting annual exercise objectives and scenario to the NRC on a schedule which would permit timely comments and incorporation of recommendations into the exercise.

2. Pertinent Observations

[See Section 5.5.2 of the Appraisal Report]

3. Action Plan

a. Actions Completed

Exercise objectives and scenario were submitted to the NRC by Boston Edison, and to FEMA by the Massachusetts Civil Defense Agency in accordance with the schedule of available NRC guidance and well in advance of the March 3, 1983 joint Boston Edison/Commonwealth of Massachusetts preparedness exercise.

b. Actions Scheduled

PNPS Procedure Number 5.8.1, "Emergency Drills and Exercises," will be revised to incorporate definition of the scope of the annual exercise, provide for backshift drills, and provide for submitting annual exercise objectives and scenario to the NRC on a schedule which would permit timely comments and incorporation of recommendations into the exercise. The scheduled completion date of this action is March 1, 1983.

c. Exceptions

None.

APPENDIX B -- ITEM 331. Item Description

Provide distribution and control of procedures at the alternate EOF and Information Center; provide annual review of the Series 23 Nuclear Operations Support Procedures; and ensure that changes in equipment, facilities, or method of operation are not implemented until the procedures have been revised, reviewed, approved, and distributed.

2. Pertinent Observations

[See Section 5.5.3 of the Appraisal Report]

3. Action Plana. Actions Completed

As per PNPS Administrative Procedure Number 1.3.4, "Procedures," all procedures and revisions are to be reviewed by the ORC and approved by the ORC Chairman prior to implementation. This procedure has been and will continue to be in effect. PNPS Procedure Number 5.7.2.22, "Use of the Emergency Dose Assessment System (EDAS)," was revised and approved on February 26, 1982.

b. Actions Scheduled

None.

c. Exceptions

As per the PNPS Emergency Plan, Section N.8.3, "Review and Updating of the Emergency Plan and Implementing Procedures," the Emergency Plan and implementing procedures will be reviewed annually and updated as necessary to incorporate results of training and drills and to account for any changes made to onsite facilities or equipment. Since the Recovery Organization and associated procedures (Series 23 of the Nuclear Operations Support Department) are an integral part of the Emergency Plan, annual review of the Recovery Procedures are provided for via the Emergency Plan.

The only Emergency Plan implementing procedures which are necessary at Information Central are the Recovery Procedures. Information Central is on the controlled distribution list for receiving the Recovery Procedures.

It is impractical and unnecessary to maintain a full set of controlled PNPS Procedures at the Alternate EOF. If it ever becomes necessary to operate out of the Alternate EOF, a full set of controlled PNPS Procedures will be transported from the EOF to the Alternate EOF at that time.

APPENDIX B -- ITEM 34

1. Item Description

Provide routine audits of the Recovery Organization Plan, procedures and their implementation, and the observation of drills and exercises.
(Section 5.5.4)

2. Pertinent Observations

[See Section 5.5.4 of the Appraisal Report]

3. Action Plan

a. Actions Completed

None.

b. Actions Scheduled

None.

c. Exceptions

The Recovery Organization Procedures are an integral part of the PNPS Emergency Plan. Section 18 of the BECO QA Manual, "Audits", provides for an audit of the Emergency Plan and associated procedures under the cognizance of NSRAC. The audit also includes a review of all drill and exercise reports and their final disposition.

APPENDIX B -- ITEM 35

1. Item Description

Develop agreements with offsite agencies to assure the availability of appropriate equipment and supplies such that these support agencies are equipped to fulfill their requested support roles; maintain current letters of agreement; and provide a summary document to offsite officials that describes their respective roles, points of contact, etc.

2. Pertinent Observations

The pertinent Appraisal Report comments were as follows:

- 1) Local officials commented that the licensee should provide a document that outlined their roles, contacts, and responsibilities;
- 2) The licensee indicated that the appropriate letters of agreement were being updated, and that agencies contacted were aware of their roles; and,
- 3) That issues requiring resolution existed with respect to radio-protective equipment for Coast Guard response personnel.

3. Action Plan

a. Actions Completed

The licensee provided assistance to state and local officials in developing procedural checklists for each local emergency response organization outlining roles, contacts, and responsibilities. This action was completed prior to March 3, 1982.

b. Actions Scheduled

The licensee will review the status of all letters of agreement, and update them as appropriate. The scheduled completion date for this action is December 31, 1982.

c. Exceptions

Procedure number 5.7.2.5 "Aerial Survey" and 5.7.2.11 "Green Environmental Monitoring Team" specify the number of self-reading dosimeters and TLDs for the associated crew members. Also, 5.7.2.11 Section III.5 states that the Radiation Emergency Team Coordinator will determine protective clothing requirements for both green survey team members and the Coast Guard crew. If the Radiation Emergency Coordinator decides that protective clothing is required, it will be supplied by the survey teams.

APPENDIX B -- ITEM 35 (Continued)

Because of the impracticality of aircraft pilots' use of respiratory protection, it was decided that it would not be used. Instead, a BZA Lapel Air Sampler would be used.

The above statements were verbally agreed to between Boston Edison and the Coast Guard in a meeting held on October 24, 1980. In addition to the above, it was agreed that; 1) no respirators were to be used in the helicopter and, 2) that the Coast Guard would support Boston Edison as long as they are dressed in the same protective clothing as Boston Edison survey teams.

The Coast Guard was also sent the following procedures: 5.7.1.1 "Emergency Categories and Associated Emergency Action Levels"; 5.7.1.6 "Emergency Communications Coordinator"; 5.7.2.5 "Aerial Survey"; and 5.7.2.11 "Green Environmental Monitoring Team". Two copies of these procedures were sent -- one to the Marine Safety Office (Boston), and one to the Scituate Station on April 28, 1981.

APPENDIX B -- ITEM 36

1. Item Description

Provide a procedure for the annual press familiarization program and include provisions for discussion of protective actions that may be recommended during an emergency and the bases for these recommendations.

2. Pertinent Observations

[See Section 6.3 of the Appraisal Report]

3. Action Plan

a. Actions Completed

Annual press familiarization programs have been instituted since the Appraisal. Discussion of protective actions that may be recommended during an emergency, and their bases, are a part of these programs.

b. Actions Scheduled

Press familiarization briefings are a part of the Boston Edison Corporate Relations Emergency Public Information Program, and will be held annually.

c. Exceptions

Proceduralization of this annual action is not necessary.