

BOSTON EDISON

Pilgrim Nuclear Power Station Rocky Hill Road Plymouth, Massachusetts 02360

September 26, 1990

Ralph G. Bird Senior Vice President -- Nuclear

The Honorable Alba C. Thompson Plymouth Board of Selectmen Town Hall 11 Lincoln Street Plymouth, MA 02360

Dear Mrs. Thompson:

Since becoming Senior Vice President-Nuclear, I have made every effort to understand and deal responsibly with the concerns of the citizens of the towns in Pilgrim's Emergency Planning Zone. In doing so, considerable Boston Edison resources (more than \$15 million over the past three years) have been expended to identify effective solutions to the real issues and support the various communities in their efforts to address their legitimate emergency preparedness needs. Working with the community officials in this way, many positive improvements have been achieved.

It is from this background of serious and constructive effort to help Pilgrim's neighbors meet their emergency planning responsibilities that I find the tone and content of your testimony at the NRC public meeting on September 6, 1990, particularly disturbing.

At that meeting, which was held to obtain the views of state and local officials and citizens on the current status of offsite emergency planning around Pilgrim Station, you represented the Board of Selectmen of the Town of Plymouth. I am not responding to all of the statements made at the hearing at this time; but, given that your testimony attacked the integrity of Boston Edison Company officials and employees and given your position of responsibility as a Selectman in the town in which Pilgrim resides, I feel compelled to respond directly to you.

At the September 6 meeting, you suggested that a "conspiracy" existed between Boston Edison and the NRC staff and alleged that Company employees "furnished...misleading and sometimes inaccurate information" to the NRC. Tr., pp. 42, 46. Your statement is not true. Boston Edison takes very seriously its legal and moral obligation to provide complete and accurate information to the NRC and other organizations. When information is provided by the Company, it is reviewed very carefully to assure that it represents our best understanding of the facts. Information regarding the offsite emergency response program which we have provided to the NRC at its request has been complete and accurate.

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Ralph G. Bird Senior Vice President — Nuclear

The Honorable Alba C. Thompson Plymouth Board of Selectmen Town Hall 11 Lincoln Street Plymouth, MA 02360 cc: T. Murley
C. Hehl
C. White
*R. Cooper
J. Johnson
J. Rogge

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*Please send a copy of this to Bob Erickson.

Dear Mrs. Thompson:

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Your testimony pointed to several examples of alleged false information being provided by Boston Edison. In particular, you stated that Boston Edison: (1) in a January 27, 1989 report erroneously identified "enhancements being done" at the Bridgewater reception center which had not yet been done, and (2) falsely testified in October and/or December 1988 that the Bridgewater and Taunton reception centers could perform monitoring and decontamination. Tr. pp. 46-48. In particular, you stated, "That was absolutely untrue testimony on the readiness of the Taunton and Bridgewater reception centers. And, it was received by the NRC and presented as the truth." Tr. p. 49.

The truth is that Boston Edison provided accurate written statements and/or testimony to the NRC on the following four occasions up to and including the January 27, 1989 report referenced in your testimony: (1) our October 4, 1988 "Report on the Status of Offsite Emergency Preparedness Around Pilgrim Nuclear Power Station"; (2) our October 5, 1988 testimony before the NRR staff; (3) our October 14, 1988 Commission meeting testimony; and (4) our January 27, 1989 "Status of Pilgrim Emergency Planning Issues as of January 27, 1989." All of these statements are on the public record. On none of these occasions did we misrepresent the facts.

The attached documents show the facts about reception center enhancements. Boston Edison did not represent that the reception center enhancements had been completed and did not testify that the reception centers were ready for monitoring and decontamination. Our October 14, 1988 testimony before the Commission does not address this issue. Our January 27, 1989 report explicitly stated that enhancements had not yet been made. Our October 4, 1988 report and October 5, 1988 NRR testimony state that the reception centers "would have the capability" of "monitoring the requisite number of persons" with "appropriate improvements and equipment procurement." (Emphasis added.) Furthermore, our October 4 and 5 statements also specify that Boston Edison committed to undertake facility improvements and equipment procurement "as soon as arrangements with the Commonwealth are concluded." Thus, at no time did we represent that enhancements which had yet to be accomplished had been completed or that necessary monitoring or decontamination facilities and equipment had yet been provided.

Secondly, I must also take strong exception to your repeated statements that Boston Edison is not an appropriate source of information on offsite emergency planning issues. In particular, you stated that the Company has "no jurisdiction" over offsite issues and that "[o]nly the towns could have...valid, up-to-date information." Tr. pp. 42, 45-46. These statements fail to recognize the fundamental contribution that Boston Edison has made in improving the status of offsite emergency preparedness over the last several years or our ongoing involvement in the planning process.

We have repeatedly and explicitly acknowledged that the offsite emergency response program belongs to the Commonwealth and local authorities, and not to Boston Edison. When we have been asked to provide information to the NRC, we have explicitly stated that we are not speaking for the towns and are presenting only our own views. You refer to our January 27, 1989 report (and subsequent status reports provided during the power ascension process) as a "pernicious channel which was filled with errors." Tr. p. 46. I must remind you that the January 27, 1989 report was provided to you in draft for comment prior to its submittal, and that the local civil defense directors were provided with subsequent reports at weekly planning meetings.

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Furthermore, while we have recognized that the offsite program is the responsibility of offsite officials, we do have information on the outstanding planning issues and on the overall state of the offsite program. We have committed a dedicated staff of professional emergency planners to the task of assisting in improving the offsite program. We have played a very significant role in the formulation of plans and procedures and developing and implementing training materials. We have spent millions of dollars on supporting the offsite program, including provision of costly emergency facility renovations and equipment.

Our professional planning staff is an excellent, knowledgeable, and reliable source of relevant information on planning issues. The Company's views are an important source of information for the regulatory agencies, along with the views of responsible and knowledgeable Commonwealth and local officials. While we do not speak on behalf of those officials, we do meet our regulatory and corporate responsibilities to provide the most accurate information available to the regulatory agencies.

Finally, you stated that Boston Edison "does not mean to continue to assist us under NUREG 0654" with respect to certain specific equipment requests by the Town. Tr. p. 50. This statement creates the misimpression that we are not supporting your offsite program. Boston Edison is providing and will continue to provide extensive resources to the Commonwealth and each of the seven EPZ and reception center towns. Our criterion for providing resources is whether or not a legitimate operational need for the equipment has been demonstrated.

We have discussed these most recent equipment requests with Plymouth officials and explained why some are not necessary to carry out the emergency response plans. We stand by our commitment to provide radios for the use of the Plymouth schools as soon as a suitable vendor is identified and the school committee has signed off on the procedures for which the radio system will be designed. However, we cannot see the emergency planning basis for providing additional four-wheel drive vehicles for the Plymouth Police Department to perform a function assigned by your procedures to the Department of Public Works, or to purchase radios for the lifeguards who have no assignment in your emergency procedures. And finally, we are convinced that there are far more economical, practical solutions to your concerns about police and fire communications than the purchase of a mobile communications van. Given our efforts to date and our long-term commitments, it is unreasonable to claim a lack of support from this Company simply because we do not fund a particular equipment request.

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In closing, I am greatly disturbed by the implications and allegations in your testimony. As an officer of the Company, I could not ignore those statements. Nevertheless, let me again assure you that we will continue to work actively with and support the efforts of the Town of Plymouth and other towns in the Pilgrim Emergency Planning Zone to improve and maintain their offsite programs. I have attached for your convenience relevant excerpts from the documents which I have referenced in this letter.

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Attachment

cc: Kenneth Carr, NRC Chairman
Thomas T. Martin, NRC Regional Administrator
John Macdonald, NRC Senior Resident Inspector
Nuclear Matters Committee
Chairmen, Board of Selectmen
Carver, Duxbury, Kingston, Marshfield, Plymouth
Civil Defense Director Hadfield
MA Secretary of Public Safety
Representative Robert Kraus
Representative Peter Forman
Congressman Gerry Studds
Senator John F. Kerry
Senator Edward M. Kennedy