

**BOSTON EDISON COMPANY**  
GENERAL OFFICES 800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

Beco. Ltr. #82-285  
November 1, 1982

Mr. Robert J. Bores  
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

Report of Actions Taken Pursuant to  
Emergency Preparedness Appraisal 50-293/81-15

References: Ltr. George H. Smith to W. D. Harrington  
dated 6/22/82 (BECO Ltr. #1.82.185)  
Ltr. J. E. Howard to George H. Smith  
dated 7/28/82 (BECO Ltr. #2.82.204)  
Ltr. George H. Smith to W. D. Harrington  
dated 8/17/82 (BECO. Ltr. #1.82.280)  
Office Memorandum B. V. Nolan to J. D.  
Fulton dated 8/6/82. Copy enclosed  
(Enclosure 1)

Dear Sir:

The licensee's letter of July 28, 1982, referenced above, constituted a written statement describing actions Boston Edison planned for improvement of items identified in Appendix A of Emergency Preparedness Appraisal 50-293/81-15, and the results of Boston Edison's consideration of each of the items in Appendix B of that report.

On August 5, 1982, NRC and Boston Edison personnel discussed the Appraisal Report and Boston Edison's action plan at Region I Headquarters. The results of that meeting are described in Ms. Mojta's summary, enclosed in your letter of August 17, 1982, referenced above, and in Mr. Nolan's report, appearing as an enclosure to this letter.

The purpose of this letter is to report the completion of all planned actions relevant to Appendix A items; to keep the NRC informed of progress on actions planned as a result of Boston Edison's consideration of Appendix B items; and to transmit Boston Edison's response to the Appendix C components of the Appraisal Report with supporting materials. Actions relative to each Appendix are described below.

BOSTON EDISON COMPANY

Mr. Robert J. Bores  
November 1, 1982  
Page Two

APPENDIX A

The licensee's letter of July 28, 1982, enclosed an action plan for addressing items described in Appendix A to the Appraisal Report. On August 5, NRC and Boston Edison representatives agreed that only four of the 20 Appendix A items required further discussion, as indicated in Ms. Mojta's summary of the meeting. With regard to Items 16 and 18 (in-plant survey and repair and corrective action procedure revisions) it had been Boston Edison's understanding that procedure revisions would await a review by Region I of up-to-date procedures in these functional areas. This understanding is reflected in Mr. Nolan's enclosed report of August 6, 1982. Boston Edison has undertaken, nonetheless, to complete the procedural revisions associated with Items 16 and 18 on the same schedule as the other Appendix A items. As indicated below, scheduled actions were completed on all Appendix A items on or before October 15, 1982.

ITEM 1 -- Function and responsibility matrix charts for both the initial and augmentative phases of emergency response, together with relevant textual references, have been developed. These were promulgated as changes to Section N.5. "Organizational Control of Emergencies", on October 15, 1982.

ITEM 2 -- Boston Edison has and will continue to maintain an awareness of available Light Duty Emergency Reserve Training offered by the Massachusetts Civil Defense Training Academy. Health Physics personnel will be scheduled for each training.

ITEM 3 -- On-site Training for Officers of both the Kingston and Duxbury Fire Departments was completed on September 16, 1982.

ITEM 4 -- No actions scheduled.

ITEM 5 -- Boston Edison completed a review of existing procedures which address the handling, sampling and analysis of liquid radwaste to determine the need for changes in the scheme for handling such wastes generated before or as a result of an accident. Appraisal Report comments were also analyzed, particularly paragraphs 5.4.2.10 and 5.4.2.11. This analysis, and the August 5, 1982 discussions with the NRC indicated concern with two functions -- sampling of liquid radwaste and analysis of these samples. Boston Edison's review of procedures indicated that recent revisions to the Re-entry procedure and development of a new procedure for analysis of reactor coolant liquid samples provides ample clarification of how those functions would be performed before, or as a result of an accident. Boston Edison's review and determination were completed on October 1, 1982.

BOSTON EDISON COMPANY

Mr. Robert J. Bores  
November 1, 1982  
Page Three

ITEM 6 -- No actions scheduled.

ITEM 7 -- No actions scheduled.

ITEM 8 -- Boston Edison has issued a purchase order for 23 one-hour SCBA packs and 46 one-hour SCBA bottles. The purchase order was issued on September 1, 1982.

ITEM 9 -- See Item 8.

ITEM 10 -- Boston Edison has placed 10 four-wheel drive vehicles in service to support emergency response functions, two at Braintree and eight at PNPS. This action was completed on September 21, 1982.

ITEM 11 -- No actions scheduled.

ITEM 12 -- No actions scheduled.

ITEMS 13 & 14 -- Following discussions with NRC personnel, Boston Edison agreed to revise the dose assessment scheme to include post-accident sample data and plant parameters to calculate projected off-site doses, and to use this information to recommend protective actions. Boston Edison has revised the three pertinent procedures (Procedure 5.7.2.18 "Off-site Dose Projections and Protective Action Guidelines for the General Public"; Procedure 5.7.2.23 "Use of Off-site Nomograms"; and 5.7.2.25 "Use of the HP-85A for Off-site Dose Calculations". Software for the HP-85A was modified to accommodate these procedural changes, and appropriate training provided to Watch Engineers, STA's, and Health Physics Supervisors. These actions were completed on October 15, 1982.

ITEM 15 -- A SAM II Unit which had been located in the TSC was added to the TSC inventory. This action was completed on September 16, 1982.

ITEM 16 -- As noted above, Boston Edison's understanding of the agreement reached during the NRC/BECO discussions of August 5, 1982, involved NRC review of up-to-date procedures prior to any action by Boston Edison. Nonetheless, following receipt of your letter of August 17, 1982, Boston Edison undertook appropriate revisions to Procedure 5.7.2.16 "Re-Entry". The procedure presently provides for high radiation precautions, utilization of appropriate protective equipment and instrumentation, and selective assignment of personnel. Dose limits for life-saving, and for protection of health, safety and property are clearly set forth. Responsibilities are established for assuring that radiation levels are monitored at the proper frequency and that significant changes will be detected. (The change involving monitoring of radiation levels includes concerns appropriate to repair and corrective action team operations, raised

BOSTON EDISON COMPANY

Mr. Robert J. Bores  
November 1, 1982  
Page Four

in Appraisal Report Appendix A, Item 18. "Proper Frequency" may, when appropriate, require continuous monitoring.) These procedure changes were implemented September 16, 1982.

ITEM 17 -- Boston Edison has completed revisions to Procedure No. 5.7.2.2 "Radiation Emergency Team Coordinator; 5.7.2.12"; and 5.7.2.13 "Brown Personnel Monitoring Team". These revisions address the decontamination of large groups of contaminated individuals, as well as the decontamination of vehicles. These revisions were implemented on September 16, 1982.

ITEM 18 -- Appropriate procedural changes were implemented on September 16, 1982. (See response to Item 16.)

ITEM 19 -- The action scheduled, which was a meeting between the licensee and NRC Region 1 personnel to explore areas where further coordination may be necessary, was completed on August 5, 1982. This item, by its nature, is an open item that will require continued coordination between Boston Edison and the NRC.

ITEM 20 -- Copies of the Emergency Public Information booklet, and of the booklet entitled "Nuclear Energy -- Questions and Answers" were mailed to 23,000 households and businesses (all identifiable addressees) in Mid-September, 1982. The emergency public information poster scheduled for development has been completed, and initial distribution to local authorities and posting in transient areas has taken place. These actions were completed on October 15, 1982.

APPENDIX B

Boston Edison's submission of July 28, 1982, included a proposed action plan which resulted from consideration of Appendix B items. These items were not formally discussed on August 5, 1982, because the NRC Staff position was that suggested improvement items did not warrant formal discussion. The Boston Edison action plan for Appendix B items accordingly remains as submitted on July 28.

Of the 36 Appendix B items, 12 required no further action (items 4, 9, 10, 12, 16, 21, 22, 26, 29, 30, 33 and 34). An additional 14 items involve actions scheduled for completion late in 1982, or during 1983 (items 1, 2, 3, 6, 7, 11, 15, 17, 20, 25, 28, 32, 35 and 36).

Of the remaining 10 items, scheduled actions for 8 have been completed (items 8, 13, 14, 18, 23, 24, 27 and 31).

The action scheduled for item 5 involved coordination between the Emergency Preparedness Coordinator and the Nuclear Training

BOSTON EDISON COMPANY

Mr. Robert J. Bores  
November 1, 1982  
Page Five

Department to improve arrangements to identify major changes to emergency equipment, facilities and procedures which require training prior to their implementation and to ensure that such training is provided.

Boston Edison's response to this item should have noted an exception to this item, since present practice precludes implementation of major procedural changes until associated training has taken place or provisions made for it. This practice would include procedural changes resulting from acquisition of new equipment, or major equipment modification. Adherence is assured by review of procedure changes by the Operations Review Committee (ORC). Boston Edison accordingly is considering this item closed.

Appendix B, Item 19 involved scheduled actions to monitor foliage growth as it affects detector siting, and complete required foliage trimming in addition to that completed around the base of the 220 ft. meteorological tower. Visual observations of detector sites revealed no clear deficiencies in good engineering practice. Additional inspections will be undertaken during the Spring foliage season. Due to the continuing nature of this requirement, and Boston Edison's explicit commitment to maintain continuous surveillance, Boston Edison will consider this item closed for purposes of Appraisal Report 50-243/81-15.

APPENDIX C

Your letter of June 22, 1982, stated: "With regard to Appendix C, you are requested to provide to this office within 120 days of this letter, page changes to the emergency plan correcting each deficiency or provide written justification as to why you believe a revision should not be made."

During discussions involving Appendix C, held on August 5, 1982, involving NRC and Boston Edison personnel, the following understandings were reached:

- 1) Pending reorganization of Boston Edison's Nuclear Organization would make comprehensive review and revision of the PNPS-1 Emergency Plan untimely and perhaps counter-productive;
- 2) Substantial revisions to state and local plans affected during 1981-1982 rendered the evaluation conducted by Emergency Preparedness Licensing during 1981 seriously outdated;

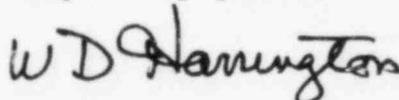
Mr. Robert J. Bores  
November 1, 1982  
Page Six

- 3) Failure on the part of the Federal Emergency Management Agency to provide the Commonwealth of Massachusetts with either a) definitive results of the Regional assistance Committee's review of off-site plans, or b) a report of the results of Federal oversight of the combined utility-government exercise of March 3, 1982, would seriously hamper any effort to definitively revise state and local plans; and,
- 4) That in these above-mentioned circumstances, Boston Edison would provide up-to-date copies of off-site plans to Mr. Van Neil, so that a review of these plans can be undertaken; and that this submission would include both a list of exceptions/clarifications to Appendix C findings, and a schedule indicating that time frame over which correction of plan deficiencies can be expected.

A set of revised state/local plans is being sent to Mr. Van Neil under separate cover. Boston Edison's response to Appendix C Appraisal Items is attached.

Should you have any questions concerning this report, please call Mr. Robert Cunningham (617)848-3812, or Mr. Bernard Nolan (617) 848-9786. I very much appreciate your consideration in these matters.

Very truly yours,



William D. Harrington

WDH/mg

Attachments

ATTACHMENT A

RESPONSE TO  
EMERGENCY PREPAREDNESS APPRAISAL REPORT

APPENDIX C  
EVALUATION OF LICENSEE EMERGENCY PLAN

## INTRODUCTION

On August 5, 1982, Boston Edison emergency planning staff members met with NRC Staff at King of Prussia, Pennsylvania, to discuss proposed actions by Boston Edison pursuant to NRC Appraisal Report 50-293/81-15. Boston Edison personnel explained to Mr. Van Niel and Mr. Smith that a number of factors precluded useful comprehensive evaluation and revision of the Pilgrim Nuclear Power Station Emergency Plan and State and local radiological emergency response plans during the 120 day period referenced in the appraisal report. Among the reasons noted were: 1) anticipated reorganization by Boston Edison with impact on E-Plan provisions, and, 2) failure of the Federal Emergency Management Agency (FEMA) to provide a report to the State in a timely manner on the results of the March, 1982 joint exercise.

Boston Edison has begun the process of comprehensively revising both on-site and off-site plans. The Appraisal Report, FEMA's report, and the results of a quality assurance audit scheduled for early November will be key components in structuring these revisions.

Boston Edison will proceed with its program of update and revision to the PNPS Emergency Plan during the next several months. An updated version is scheduled for submission to the NRC by the end of February, 1983.

Boston Edison will also continue to make available in-house and/or consultant resources to the State and local emergency preparedness organizations to assist in updating State and local radiological emergency response plans. Based on discussions with State authorities, it is expected that these revisions can be completed on or before April 15, 1983, and therefore, become available to FEMA Regional Assistance Committee members in time to be the basis for actions exercised in the Spring of 1983 (the joint preparedness exercise for Pilgrim is presently scheduled for mid-May, 1983).

A. ASSIGNMENT OF RESPONSIBILITY

1. Submit to the NRC approved State and local plans.

(a) Actions Completed

Under Massachusetts law, localities must maintain emergency plans consistent with the State plan and program. Local RERP plans are a part of the State RERP plan, approved and implemented on December 30, 1979, updated in December, 1980, and submitted formally to the NRC on January 2, 1981. Signature by the Selectmen is not necessary for the local plans to be implemented.

As in many other areas, Selectmen in communities around Pilgrim have viewed "approval" of the plans as an endorsement of their content in the eyes of the public. Five of eight communities have nonetheless provided revised plans signed by the Selectmen.

(b) Actions Scheduled

During the process of comprehensively revising local plans, Boston Edison will seek to assure, through the Commonwealth, that updated plans are signed by the Selectmen in all communities. Revisions will be submitted to the NRC. This action is scheduled for completion during the first quarter of 1983.

2. Specify the interface with the State of Rhode Island dealing with the ingestion pathway.

(a) Actions Completed

Section B.6 of the State RERP provides for interstate coordination of ingestion exposure actions.

(b) Actions Scheduled

Boston Edison will provide for a review of State plan provisions for interface with the State of Rhode Island during efforts to update and revise the State RERP.

3. Specify the concept of operations of all the towns within the plume exposure EPZ to demonstrate 24 hour/day protective action decision-making and communications capabilities. . . (etc.).

(a) Actions Completed

Revisions to local plans completed in 1980 and 1981 set forth clear concepts of operations and provide for 24 hour per day decision-making. These aspects of local plans were reviewed and approved by FEMA in March, 1982, without pertinent exceptions.

(b) Actions Scheduled

None.

4. Provide 24 hour onsite emergency manpower planning.

(a) Actions Completed

A manpower coordinator was provided for, and associated procedures implemented during early 1982. No exceptions to these provisions were taken by the NRC as a result of the March, 1982 exercise.

(b) Actions Scheduled

None.

5. Describe the interface with NRC Region I.

(a) Actions Completed

A meeting with NRC response personnel was held on August 5, 1982, to discuss interface problems (see response to Appendix A, Item 19.)

(b) Actions Scheduled

Boston Edison will examine the desirability and feasibility of expanding plan provisions for interface with NRC response teams.

B. EMERGENCY RESPONSE ORGANIZATION

(a) Actions Completed

The 12 items listed as requiring resolution have been overtaken by events since the July, 1981 appraisal. Many have also been resolved as a result of items appearing in Appendix A or B. Many of the cited functions and responsibilities have been tested and observed by the NRC during the March, 1982 exercise. Exceptions are noted below.

(b) Actions Scheduled

- (1) Boston Edison will review provisions for the transfer of the Emergency Director's function, and make appropriate changes or additions (item 2).
- (2) Boston Edison will provide appropriate letters of agreement, and certify that these are up to date.

C. EMERGENCY RESPONSE SUPPORT AND RESOURCES

No items requiring resolution were listed.

D. EMERGENCY CLASSIFICATION SYSTEM

All of the items referenced in this section as requiring resolution were addressed in responses to Items 11, 13 and 14 of Appendix A of the Appraisal Report. All actions were completed by October 15, 1982.

E. NOTIFICATION METHODS AND PROCEDURES

(a) Actions Completed

A number of concerns are raised in the text which are based on a misconception of the decision chain for implementing protective actions off-site. Procedures presently provide for the plant to automatically recommend shelter within 5 miles upon declaration of a General Emergency condition. This recommendation is immediately transmitted by the State Police to all affected communities. Local plans empower public safety authorities to immediately implement public notification.

Boston Edison's prompt alert and notification system was installed and initially tested on February 26, 1982. On June 26, 1982, Boston Edison, in cooperation with State and FEMA authorities conducted a comprehensive evaluation of system coverage. FEMA's report on this evaluation has not been issued as of this date.

State authorities have demonstrated a capability to rapidly formulate and disseminate emergency information to the public during the March 3, 1982 exercise and during numerous actual emergencies.

(b) Actions Scheduled

Boston Edison will work with State authorities to evaluate the need for "canned" EBS messages.

F. EMERGENCY COMMUNICATIONS

(a) Actions Completed

Dedicated telephone interconnection among the TSC, Control Room and EOF were installed prior to the March, 1982 exercise. Radio lines using the Civil Defense administrative frequency and RACES frequencies, and the capability to remotely control the Boston Edison base station from the AEOF were also installed at this time. Provisions for communications with the State of Rhode Island are set forth in the State RERP.

(b) Actions Scheduled

Boston Edison will assist Massachusetts authorities to review the adequacy of provisions associated with State of Rhode Island ingestion pathway communications.

G. PUBLIC INFORMATION

(a) Actions Completed

(1) Public information has been mailed to all addressees, and otherwise broadly distributed in the plume exposure EPZ, on an annual basis since 1980, in accordance with the State RERP and Massachusetts law. The most recent

distribution took place in September, 1982.

- (2) Information for transients was developed and posted in October, 1982, as reported in response to Appraisal Report item 20 of Appendix A.
- (3) Rumor control provisions exist in media center procedures. Also, the State operates a rumor control center, equipped with toll-free telephone access and 30-button dial directors, in the State EOC.

(b) Actions Scheduled

None.

(c) Exceptions

While Boston Edison may provide for small presspool tours of the EOF during operations, depending upon the nature of a particular incident, no provisions will be made to incorporate EOF press briefings in the PNPS Emergency Plan.

H. EMERGENCY FACILITIES AND EQUIPMENT

(a) Actions Completed

- (1) Procedural provisions have been made for reserve instruments to replace those removed for repair or calibration.
- (2) Backup power to the EOF has been provided.
- (3) Basic and communications equipment for the AEOF is in place.
- (4) Equipment and supplies for the TSC and Cape Cod Bay monitoring teams are described in appropriate procedures.

(5) Additional SCBA units have been ordered as reported in response to Appendix A, Item 9. Provisions for other equipment for OSC use have been made, and were accepted by the NRC in its review of the response to Appendix A, Item 7.

(b) Actions Scheduled

Boston Edison will review descriptive material in the existing plan and procedures, and undertake appropriate revisions.

(c) Exceptions

Boston Edison will await further development of meteorological program guidance before committing to changes in the program or its description.

I. ACCIDENT ASSESSMENT

(a) Actions Completed

- (1) Meteorological data is available in the TSC through direct links with the EOF.
- (2) Methods for projecting containment radiation levels and off-site doses were incorporated into emergency procedures in response to Appraisal Report Appendix A Items 13 and 14.
- (3) Backshift response times have been estimated and validated by drills. These results were reported to the NRC in June, 1981.
- (4) Procedures for post-accident sampling and analysis have been submitted to the NRC (see response to Appendix A, Item 5).

(b) Actions Scheduled

Boston Edison will review the adequacy of methods for determining actual isotopic composition of releases and for incorporating results into dose projections.

Boston Edison will, in coordination with State authorities, seek to affirm use of Coast Guard aerial plume surveillance capability or provide for suitable alternative capability.

J. PROTECTIVE RESPONSE

(a) Actions Completed

- (1) Actions responsive to items 1 - 4 have been completed, either in the context of revisions to the PNPS Emergency Plan or in response to Appendix A and B items.
- (2) Massachusetts policy presently provides that KI will not be used for the general public. Utilization procedures for MDPH personnel were successfully tested during the March, 1982 exercise.
- (3) Site maps, suitable for aids in site evacuation, are prominently posted in the EOF.
- (4) Emergency decontamination criteria have been established in response to Appraisal Report Appendix A item 17.
- (5) Items 10, 11 and 12 have been addressed in the context of evacuation time estimates prepared by HMM Associates for the Pilgrim EPZ, submitted to NRC, and made available to State protective action decision-makers.
- (6) Plume exposure EPZ maps consistent with NUREG 0654 guidance have been placed in the EOF, State and local EOC's, and other critical locations since early 1980.

(b) Actions Scheduled

- (1) KI is presently available for use in emergency in the EOF. Boston Edison will consider stockpiling in the Control Room and the OSC.
- (2) Boston Edison will consider a review of the adequacy of habitability assessments conducted to date for the EOF, TSC and OSC.
- (3) Boston Edison will encourage and assist in a review of the adequacy of evacuation time estimates for special facilities and special populations.

K. RADIOLOGICAL EXPOSURE CONTROL

(a) Actions Completed

Exposure guidelines and provisions for exposure control during emergencies were addressed in responses to Appraisal Report Items 16 - 18.

(b) Actions Scheduled

None.

L. MEDICAL AND PUBLIC HEALTH

Boston Edison does not consider the item listed as requiring resolution ("Provide for long-term care for contaminated plant personnel") as appropriate for consideration in the context of emergency plans and procedures.

M. RECOVERY AND RE-ENTRY PLANNING AND POST ACCIDENT OPERATIONS

(a) Actions Completed

- (1) State plans presently assign responsibility to the State Department of Public Health for estimating population dose estimates.

- (2) Recovery procedures presently provide ample description of who is responsible for reductions in emergency class, and how these actions are coordinated with off-site officials. These provisions have been exercised and observed during the March, 1982 exercise.

N. EXERCISES AND DRILLS

(a) Actions Completed

All actions associated with annual exercises and periodic drills have been completed and are in practice, with the exception of items noted as scheduled, below.

(b) Actions Scheduled

- (1) A drill of post-accident sampling and analysis is scheduled during calendar year 1982.
- (2) Boston Edison will evaluate the adequacy of provisions for communication and coordination with officials responsible for protective action decision-making in the State of Rhode Island.

O. RADIOLOGICAL EMERGENCY RESPONSE TRAINING

Two items are identified as requiring resolution, Item 1 was addressed in Boston Edison's response to Item 18 of Appendix A of the Appraisal Report. Item 2, involving provisions for documenting the training program, are amply addressed in Boston Edison's Training Manual.

P. RESPONSIBILITY FOR THE PLANNING EFFORT

(a) Actions Completed

Emergency notification list telephone numbers (for all key officials, on-site and off-site) are updated and distributed, on a controlled basis.

(b) Actions Scheduled

Agreements with off-site officials will be reviewed on an annual basis.

\* \* \* \* \*

OFFICE MEMORANDUM



To J. M. Fulton Prepared by B. V. Nolan

Date August 6, 1982 Reviewed by [Signature]

DC: Nuclear Records Center Approved by R. H. Cunningham

W. D. Harrington  
J. E. Howard  
A. V. Morisi  
T. L. Sowdon  
ERHS #82-62

Title: REPORT OF RESULTS OF MEETING WITH NRC OFFICIALS AT NRC REGION I, AUGUST 5, 1982

RECORD CATEGORY:
UNIT APPLICABILITY:
PNPS FILE NUMBER:

8+1

Boston Edison and NRC Region I and Headquarters representatives met at 10:00 AM on August 5, 1982 at King of Prussia, Pennsylvania. A list of attendees is attached. The meeting was opened by George H. Smith, Director of Region I's Division of Emergency Preparedness and Operations Support, who immediately turned the meeting over to Boston Edison. Subsequently, the meeting proceeded according to a suggested agenda prepared by Boston Edison. The results are summarized, by agenda item, below.

(1) Emergency Response Liaison

Tim Martin summarized NRC Region I concerns about the effectiveness of liaison during the alert following the TIP incident. He felt that once liaison was shifted from the Control Room to the TSC, it was ineffective, and Region I no longer was in close touch with the situation. He summarized his position by saying that both the HPN and ENS lines should be maintained exclusively for dose assessment and accident trend data, respectively, and that a third link for accident management information is necessary. He stated that NRC people wanted to be talking to engineers and health physics professionals with direct access to real-time information during an event.

Bob Cunningham explained to Mr. Martin Boston Edison's concept of using the TSC as a buffer for the Control Room during an emergency, and noted that many of the apparent problems during the TIP incident resulted from NRC's failure to observe their own accepted procedures.

The area of liaison during an emergency needs more work. Dedicated phones exist for NRC use in the EOF, but the question of who should man these links during the early stages of an emergency must be addressed procedurally.

(2) Emergency Preparedness Appraisal Response - Appendix A Items

Mr. Crocker and Ms. Mojta indicated general satisfaction with the response to all items except items 11, 13, 14, 16 and 18. They characterized their concerns with the response to items

2

CONTROL COPY

RECORD TYPE AY.08

QA  NON: QA

KEYWORDS Rept. of Results of mtg w/ NRC officials - 8/5/82

CONTROLLED DISTRIBUTION?

YES  NO

COMPONENT #: -

Q-LIST #: -

RMG CONTROL 22, 1861

DOCUMENT  
RELEASED  
AUG - 9 1982  
FOR USE  
CONTROL STATION 3

PRU DISTRIBUTION		
ENG	WO/A	W/A
P2PM		
PS & CC		
NOSM		X
QAM		
NEM		
DEP. NEM		
MSG		
LG		
ERHS		X
RMG		
C/S		
S & SA		
T & MC		
PS		
CSG		
NAG		
X		

FILES JMF BYM  
RHC, WDH, JEN

WORKING COPY

OFFICE MEMORANDUM

To J. M. Fulton Prepared by B. V. Nolan  
Date August 6, 1982 Reviewed by  
cc: Nuclear Records Center Approved by

RECORD CATEGORY:  
UNIT APPLICABILITY:  
PNPS FILE NUMBER:

Title: - 2 -

11 and 18 as "very minor". The discussion of each of these items is summarized below.

Item 11 - When this item was reached in the agenda, Mr. Crocker said that NRC did not, in fact, have any problem with Edison's response.

Items 13 and 14 - During the discussion of item 13, it became apparent that items 13 and 14 could most effectively be addressed together. Discussion was lengthy, but a common understanding was reached. Notable elements of that understanding are:

... The "post accident sampling" referenced in item 13 is intended to mean sampling related to containment source term, not effluents;

... Boston Edison has established methods and techniques for quantifying the source term of potential releases;

... Boston Edison will revise Procedure 5.7.2.18, as indicated in the appraisal response. NRC will review the revision to determine if their concerns with items 13 and 14 are met;

... Concerns involving protective action recommendations to state authorities were based on the assumption that the only recommendation made was that included in initial off-site notifications. Mr. Nolan and Mr. Cunningham explained the close interaction of the Emergency Staff and Massachusetts Public Health officials in the EOF.

Item 16 - Mr. Terc explained his concerns at some length. For the most part, these involved a lack of procedures specific to in-plant surveys under emergency conditions. NRC will review up-to-date copies of relevant procedures, and notify Boston Edison in their planned response if further revisions are necessary. (At a minimum, some revision to Procedure 5.7.2.16 "Re-Entry" will likely be necessary.)

OFFICE MEMORANDUM

To J. M. Fulton Prepared by B. V. Nolan  
Date August 6, 1982 Reviewed by  
cc: Nuclear Records Center Approved by

RECORD CATEGORY:  
UNIT APPLICABILITY:  
PNPS FILE NUMBER:

Title: -3-

Item 18

Following a brief discussion, Mr. Crocker agreed to review up-to-date procedures, and, based on that review, notify Boston Edison if further revisions beyond those already committed to are required.

(3) Emergency Preparedness Appraisal Response - Appendix B Items

Mr. Crocker indicated that Boston Edison's response to Appendix B was accepted, that no response would be prepared by NRC, and that Boston Edison might wish to discuss some notes made by Ms. Mojta following the meeting. Mr. Cunningham and Mr. Nolan reviewed Ms. Mojta's notes. They did not involve a need for any actions beyond those committed to in the Appraisal Report response.

(4) Emergency Preparedness Appraisal Report - Discussion of Planned Appendix C Response

Mr. Cunningham explained to Mr. VanNiel the impossibility of completing all plan changes before October 30, 1982. Major problems with so early a date are 1) anticipated reorganization by Boston Edison with impact on E-Plan provisions; and 2) Failure of FEMA to provide a report to the state on the adequacy of off-site preparedness in a timely manner. (A report due several weeks after the March 3, 1982, exercise, which Boston Edison personnel reviewed in April, has still not been finalized.)

Mr. VanNiel indicated that he understands these difficulties, and a response including revisions where possible, and a proposed schedule for further changes would be acceptable.

Mr. Nolan pointed out that the state and local plans reviewed by the NRC Emergency Preparedness Licensing Branch were already considerably out of date at the time of the appraisal, and that a complete review of 1982 off-site plans might be worthwhile. Mr. VanNiel agreed.

OFFICE MEMORANDUM

To J. M. Fulton Prepared by B. V. Nolan  
Date August 6, 1982 Reviewed by \_\_\_\_\_  
cc: Nuclear Records Center Approved by \_\_\_\_\_

RECORD CATEGORY:
UNIT APPLICABILITY:
PNPS FILE NUMBER:

Title: -4-

(5) Report on Evaluation of Siren System Coverage

Boston Edison described the objectives of its June 18, 1982 test, and provided Mr. VanNiel (Headquarters) and Mr. Snyder (Region I) with copies of the evaluation report.

Agenda item 1, Emergency Response Liaison, is a PIP action item.

PILGRIM - NRC MEETING 8/5/82

<u>NAME</u>	<u>TITLE</u>	<u>ORGANIZATION</u>
H. W. Crocker	Chief, Emerg. Prep. Sec.	NRC-RI
W. R. Hoey	Sr. Rad. Prot. Engr.	BEC0
Bruce Eldredge	Sr. H.P. Engr.	BEC0
Tom Sowdon	ERHS Group Leader	BEC0
Robert Cunningham	Staff Asst.-Nuclear	BEC0
Bernard Nolan	Emer. Planning Coord.	BEC0
T. C. Elsasser	Sec. Chief - Reactor Projs. 1B	NRC-Reg. I
George H. Smith	Dir., Div. of Emer. Prep. & Ops. Support	NRC-Reg. I
Gary L. Snyder	Chief, Emer. Prep. & Program Support Branch	NRC-Reg. I
Nemen M. Terc	Emer. Prep. Coord.	NRC-Reg. I
T. Martin	Dir., DETI	NRC-RI
Marie T. Mojta	Rad. Specialist	NRC-Reg. I
Richard Van Niel	Sec. Leader, E.P. Licensing Br. HQ	NRC-HQ