OCT 26 1984

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Docket No. 50-293

CAL No. 84-20

Boston Edison Company M/C Nuclear ATTN: Mr. William D. Harrington Senior Vice President, Nuclear 800 Boylston Street Boston, Massachusetts 02199

Gentlemen:

This refers to the telephone conversation on October 26, 1984 between you, Mr. R. Starostecki, myself, and members of our respective staffs, regarding the unplanned extremity exposure to an individual on August 18, 1984, and your plans for improving the Radiological Controls Program at the Pilgrim Station.

With regard to the matters discussed, we understand that you have undertaken or will undertake and complete the following actions:

- Complete by December 30, 1984 an independent contractor assessment of the Radiological Controls Program at Pilgrim Station. This assessment shall include, as a minimum, the following areas:
  - Radiological Control Program Organization, including position responsibilities and authorities;
  - (2) personnel selection, qualification and training program;
  - external exposure control program;
  - (4) internal exposure control program;
  - (5) radiological controls surveillance program;
  - (6) ALARA program;

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- (7) corrective action system;
- (8) management review and audit.
- Provide a copy of any and all contractor's reports of the assessment discussed in paragraph 1 to the Regional Administrator, Region I, by January 30, 1985.

3. Submit for review and approval by the Regional Administrator, Region I, by February 28, 1985, a Radiological Improvement Plan for upgrading the Radiological Controls Program. This plan shall address as a minimum the programmatic improvements necessary to correct the deficien-

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cies identified during the assessment discussed in paragraph 1 and shall describe:

- (1) action items to be performed;
- (2) the integration of these action items into existing programs as complimentary facets of your overall radiological controls program;
- (3) the schedule for completion of the specific items; and
- (4) the system for monitoring and tracking the status and completion of the actions items.

All action items shall be completed by December 30, 1985 unless otherwise justified. Until such time that all actions are completed, quarterly reports regarding the status of program improvements shall be provided to the Regional Administrator, Region I.

4. Submit by February 28, 1985, for review and approval by the Regional Administrator, Region I, an Interim Plan for effecting adequate management oversight and maintaining sufficient radiological controls of work in progress until the action items described in the Radiological Improvement Plan are complete. As a minimum, these interim actions shall include radiological surveillance of work in progress, periodic transmittal of reports of surveillances and audits to a senior level manager (Vice-president or higher) for review, enhancement of technician training and qualification in maintaining control of radiologically hazardous activities, and means to assure that personnel are aware of radiological incidents and corrective measures thereof.

If our understanding of your planned actions described above is not in accordance with your actual plans and actions being implemented, please notify the office by telephone within 24 hours of your receipt of this letter.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Thomas T. Martin, Director Division of Engineering and Technical Programs

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A.V. Morisi, Manager, Nuclear Management Services Department C. J. Mathis, Station Manager Joanne Shotwell, Assistant Attorney General Paul Levy, Chairman, Department of Fublic Utilities Plymouth Board of Selectmen Plymouth Civil Defense Director Senator Edward P. Kirby Public Document Room (PDR) Local Public Document Room (LPDR) Nuclear Safety Information Center (NSIC) NRC Resident Inspector Commonwealth of Massachusetts (2)

## bcc:

Region I Docket Room (with concurrences) DPRP Section Chief J. Axelrad, IE R. Bellamy, RI E. Jordan, IE J. Gutierrez, RI D. Heledo, RI

