

APR 08 1992

Docket No. 50-293

Mr. Roy A. Anderson
Senior Vice President-Nuclear
Boston Edison Company
Pilgrim Nuclear Power Station
RFD #1 Rocky Hill Road
Plymouth, Massachusetts 02360

Dear Mr. Anderson:

Subject: Inspection No. 50-293/91-28

This refers to your letter dated March 3, 1992, in response to our letter dated January 23, 1992.

Thank you for clarifying the circumstances associated with our observation, during the December 12, 1991 Emergency Preparedness exercise at Pilgrim, that a member of the Health Physics Organization failed to follow instructions from Operations Support Center Management regarding protective clothing requirements. Further, we appreciate your informing us of the corrective and preventive actions to avoid similar misperceptions in the future, as documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:
James H. Joyner

James H. Joyner, Chief
Facilities Radiological Safety
and Safeguards Branch
Division of Radiation Safety
and Safeguards

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cc:

E. Boulette, Vice President, Nuclear Operations and Station Director
E. Kraft, Plant Manager
J. Dietrich, Licensing Division Manager
V. Oheim, Manager, Regulatory Affairs Department
D. Tarantino, Nuclear Information Manager
N. Desmond, Compliance Division Manager
R. Hallisey, Department of Public Health, Commonwealth of Massachusetts
R. Adams, Department of Labor and Industries, Commonwealth of Massachusetts
D. Long, Security Group Leader
The Honorable Edward M. Kennedy
The Honorable John F. Kerry
The Honorable Edward J. Markey
The Honorable Edward P. Kirby
The Honorable Peter V. Forman
B. McIntyre, Chairman, Department of Public Utilities
Chairman, Plymouth Board of Selectmen
Chairman, Duxbury Board of Selectmen
Plymouth Civil Defense Director
Paul W. Gromer, Massachusetts Secretary of Energy Resources
Sarah Woodhouse, Legislative Assistant
A. Noguee, MASSPIRG
Regional Administrator, FEMA
Office of the Commissioner, Massachusetts Department of Environmental Quality
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Office of the Attorney General, Commonwealth of Massachusetts
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Chairman, Citizens Urging Responsible Energy
Public Document Room (PDR)
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NRC Resident Inspector
Commonwealth of Massachusetts, SLO Designee

"OFFICE OF THE ATTORNEY GENERAL"

Boston Edison Company

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bcc:

Region I Docket Room (with concurrences and IFS Forms)

Management Assistant, DRMA (w/o encl)

DRS SALP Coordinator

DRSS SALP Coordinator

J. Linville, DRP

J. Rogge, DRP

J. Macdonald, SRI - Pilgrim (with concurrences and IFS Forms)

W. Butler, NRR

R. Eaton, NRR

R. Lobel, OEDO

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RI:DRSS
Lusher/GMP
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3/16/92

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4/18/92



BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

Roy A. Anderson
Senior Vice President - Nuclear

March 3, 1992
BECO Ltr. 92-024

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

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

Subject: REPLY TO INSPECTOR FOLLOW ITEM 50-293/91-28-01 (REFERENCE NRC
REGION I INSPECTION REPORT NO. 50-293/91-28)

Enclosed is Boston Edison Company's reply to the Inspector Follow Item
contained in the subject inspection report.

Please do not hesitate to contact me if there are any questions regarding the
enclosed reply.


R. A. Anderson

RLC/bai

Enclosure: Reply to Inspector Follow Item 50-293/91-28-01

cc: Mr. Thomas T. Martin
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Rd.
King of Prussia, PA 19406

Mr. James H. Joyner, Chief
Facilities Radiological Safety and Safeguards Branch
Division of Radiation Safety and Safeguards, Region I
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475 Allendale Road
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BECo Ltr. 92-024

cc:

Mr. R. B. Eaton
Division of Reactor Projects I/II
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Rockville, MD 20852

Sr. NRC Resident Inspector - Pilgrim Station

Standard BECo Distribution

ENCLOSURE

REPLY TO INSPECTOR FOLLOW ITEM 50-293/91-28-01

Boston Edison Company
Pilgrim Nuclear Power Station

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

INSPECTOR FOLLOW-ITEM (IFI) 50-293/91-28-01

"The NRC team identified the following concern associated with OSC performance:

- The health physics member of the team assigned to perform high pressure coolant injection pump repairs, on his own initiative, did not follow instructions from OSC management or prescribed by the radiation work permit regarding donning of protective clothing for contamination control. This was found to be an isolated occurrence which, in an actual emergency of the type simulated, could have resulted in contamination of the individual but would not have precluded effective emergency plan implementation in this area (IFI 50-293/91-28-01)."

REPLY TO IFI 50-293/91-28-01

Our review and evaluation of the circumstances associated with this Follow Item determined the Health Physics Technician was following guidance issued by radiological supervision and allowed by procedure at the time the team was dispatched in the plant. Our evaluation also determined that without access to all participant discussions held in the OSC as well as controller documentation generated in support of the in-plant team, an exercise observer/evaluator could easily perceive the events as stated in IFI 50-293/91-28-01. This conclusion was arrived at after a thorough review of all controller/participant documentation as well as interviews with involved participants and controllers.

The results of our evaluation include:

- The Onsite Radiological Supervisor determined that radiological conditions in the plant did not warrant separate use of the Radiological Re-Entry Briefing Sheet meaning radiological controls for job coverage in the plant would be conducted in a normal routine RWP manner. This is procedurally allowed in EP-IP-510, "Re-Entry", under the Responsibilities of the Onsite Radiological Supervisor. This decision was also documented on the controller checklist for the team in question. Copies of these documents are available at Pilgrim Station.
- Discussions with both the Radiation Protection Coordinator in the OSC and the Onsite Radiological Supervisor in the TSC indicated the Health Physics Technician was directed to provide normal job coverage for this in-plant team. Specifically, the non-health physics team members were directed to don precautionary protective clothing while the Health Physics Technician was directed to monitor their activities in a non-contaminated area. The technician had received his instructions prior to the briefing of the maintenance workers, which could have contributed to the perception that he was ignoring the protective clothing instructions being issued to the team.

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ENCLOSURE

REPLY TO INSPECTION FOLLOW ITEM 50-293/91-28-01 (CONTINUED)

- Due to an actual local area hot spot in the vicinity of the HPCI skid, the maintenance team was forced to simulate in an area other than that where the maintenance activities would have actually occurred. This made it difficult to show how proper radiological controls would have been conducted in order to perform the assigned task. This may have led to additional confusion.

Based upon the information presented above, we feel the technician did not ignore direction to don protective clothing but was instead following his instructions as determined and directed by the Radiation Protection Coordinator in the OSC.

To aid in precluding such occurrences in the future, the circumstances associated with this occurrence will be discussed in future training sessions for exercise participants. The training will stress the importance of thoroughly communicating player/participant actions to ensure these actions are correctly perceived by observers and evaluators.

Boston Edison Company will continue to provide strong management support and oversight of the Emergency Preparedness area to ensure continued improvement.