## BOSTON EDISON COMPANY 800 BOYLSTON STREET BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON SENIOR VICE PRESIDENT June 1, 1984 BECo Ltr. #84-073

Mr. Thomas T. Martin Director, Division of Engineering and Technical Programs U.S. Nuclear Regulatory Commission Region I 631 Park Avenue King of Prussia, PA 19406

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

## Submission Pursuant to Inspection No. 50-293/84-05

Reference: Letter - Thomas T. Martin to William D. Harrington, dtd. April 2, 1984 (BECo Ltr. #1.84.088)

Dear Sir:

Your above-referenced letter requested that Boston Edison provide to the Division of Engineering and Technical Programs page changes to the Pilgrim Nuclear Power Station Emergency Plan correcting each of the 19 deficiencies Identified in Paragraph 4 of the report issued pursuant to Inspection Number 50-293/84-05, or provide written Justification as to why Boston Edison believes a revision should not be made.

The findings identified in Paragraph 4 of the Inspection Report were consistent with discussions held by Mr. Craig Gordon of your office with Mr. Bernard Noian of Boston Edison during the inspection period and at the exit interview. I am accordingly submitting, as an enclosure to this letter, proposed page changes to the text of Sections N.1 through N.8 of the PNPS Emergency Plan.

The change proposed as a result of the findings identified during inspection 84-05 have been incorporated into a more comprehensive revision to these sections, which is intended to satisfy some of the other concerns raised by Appendix C of the 1981 Emergency Preparedness Appraisal and to reflect organizational, administrative, and procedural changes which have taken place at PNPS. Changes and existing text which we believe will satisfy the 19 findings of the Inspection Report have been highlighted in the margins. A cross-keyed index relating each finding to the relevant section(s) and paragraph(s) has been included to facilitate your verification process.

E. T. . ...

Mr. Thomas T. Martin U.S. Nuclear Regulatory Commission June 1, 1984 Page Two

I would like to note that as a result of actions taken by Boston Edison and subsequently verified by NRC inspection, the NRC had previously found that for Pilgrim Station, onsite and offsite emergency preparedness is adequate, that emergency plans have been upgraded in accordance with NUREG-0737, Item III.A.2.I, and that there is reasonable assurance that prompt protective measures can and will be taken to protect the public. I hope and expect that the enclosed submission will permit a finding that, when these changes are incorporated, the PNPS Emergency Plan will fully comply with the requirements of IOCFR50, Appendix E, IV, "Content of Emergency Plans."

Please note that these proposed changes are submitted for information only and may be subject to change as they are reviewed and approved in accordance with PNPS Technical Specifications. I expect that this process will be complete by July 1, 1984.

Should you or the Division staff have questions on these changes, I suggest that Mr. Gordon discuss them directly with Mr. Nolan.

Your cooperation and consideration on this matter is appreciated.

Sincerely,

William D. Harrington

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Enclosure: Proposed Page Changes to PNPS Emergency

Plan with Cross-Keyed Index

## Cross-Keyed Index Relating Findings of Inspection Report 50-293/84-05 to Proposed PNPS Emergency Plan Revisions

84-05 Item #6	PNPS E-Plan 11 Paragraph #	PNPS E-Plan 11 Page #
4.18	N.8.1.2.2.4	N.8-25
4.19	N.8.1.1 N.8.1.1.1 N.8.1.1.2	N.8-2/3 N.8-8 N.8-11