

November 29, 1984  
EN 84-70

OFFICE OF INSPECTION AND ENFORCEMENT  
NOTIFICATION OF SIGNIFICANT ENFORCEMENT ACTION

Licensee: Boston Edison Company, Boston, MA  
Docket No. 50-293 (License No. DPR-35)  
Pilgrim Nuclear Generating Station, Unit 1

Subject: ORDER MODIFYING LICENSE

This is to inform the Commission that an Order Modifying License is being issued today to Boston Edison Company. In August 1984 the NRC conducted inspections to review the circumstances associated with the unplanned occupational radiation exposure of 1.1 rem to the hand of a contractor employee. The exposure occurred when the employee picked up with his right hand a highly radioactive chip exhibiting radiation dose rates on contact of approximately 1100 rem/hour while performing work in the Control Rod Drive (CRD) Repair Room. Adequate radiological controls were not implemented during the performance of the work in that adequate surveys of the room were not performed prior to or during work in the room, adequate instructions were not provided to the worker by the health physics technician regarding precautions to be taken to minimize exposure, and the procedures used during the CRD disassemblies by contractor personnel had not been reviewed and approved by the licensee. The violations of NRC requirements associated with this event represent a continuing problem in the effective implementation of radiological controls during the performance of work in the CRD Repair Room. On April 17, 1984, a Notice of Violation and Proposed Imposition of Civil Penalty (EA 84-29) was issued to the licensee in the amount of \$40,000 for similar violations associated with a similar unplanned exposure which occurred in the CRD Repair Room in January 1984, involving improper handling of highly radioactive chips. The licensee paid the civil penalty on May 21, 1984. Also, in May 1984 other similar violations were identified by the NRC involving failure to perform surveys and properly instructing individuals during work performed in the residual heat removal quadrant and in the drywell.

Collectively, these occurrences represent significant programmatic deficiencies in the radiation protection program at Pilgrim. Accordingly, an Order Modifying License is being issued today which requires Boston Edison Company by December 30, 1984 to complete an independent contractor assessment of the radiological controls program at the Pilgrim Station. The assessment shall include, but not be limited to the following areas: (1) radiological control program organization, including position responsibilities and authorities; (2) personnel selection, qualification and training program; (3) external exposure control program; (4) internal exposure control program; (5) surveillance program; (6) ALARA program; (7) corrective action system; and (8) management oversight. In addition, by February 28, 1985, Boston Edison Company is required to submit a Radiological Improvement Plan (RIP) for upgrading the radiological controls program. The RIP shall address at a minimum the programmatic improvements necessary to correct the deficiencies identified during the assessment and shall describe: (1) action items to be performed; (2) the integration of these action items into existing programs as complimentary facets of the overall radiological

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controls program; (3) the schedule for completion of the specific action items; and (4) the system for monitoring and tracking the status and completion of the action items. Also, by February 28, 1985, Boston Edison is required to submit an Interim Plan for effecting adequate management oversight and maintaining sufficient radiological controls of work in progress until the action items described in the RIP are completed. As a minimum, these interim actions shall include radiological audits of work in progress, transmittal of bi-weekly reports of the audits to the Senior Vice President 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.

The State of Massachusetts will be notified.

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