

27 NOV 1984

Docket No. 50-293

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

Gentlemen:

Subject: Inspection No. 50-293/84-22

This refers to the routine safeguards inspection conducted by Mr. Jack Dunlap of this office on July 16-20, 1984, at the Pilgrim Nuclear Power Station (PNPS), Plymouth, Massachusetts, of activities authorized by NRC License No. DPR-35 and to the discussions of our findings held by Mr. Dunlap with Mr. C. Mathis and other members of your staff at the conclusion of the inspection. This also refers to telephone discussions between Mr. J. McEachern, PNPS Loss Control Group Leader, and Messrs. Dunlap and/or W. Madden on July 26 and 27, September 7, and October 30, 1984, and a telephone conversation between Mr. Lee Oxsen, Vice President, Nuclear Operations, and myself on August 8, 1984 to discuss the inspection findings and to arrange a management meeting in Region I. That meeting was held at King of Prussia, Pa. on August 14, 1984 and was attended by Mr. John McEachern, myself, and other member of the NRC Region I staff. The matters discussed at that meeting are documented in the meeting summary transmitted with our letter of October 11, 1984.

Areas examined during the July 16 - 20, 1984, inspection are described in the NRC Region I Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Our inspector also reviewed the actions you had taken to correct the violations brought to your attention in the enclosure to our letter dated June 30, 1983. We have no further questions regarding the corrective action for Violation A. However, with regard to Violation B, your corrective action was not effective since a violation of the same requirement was again cited during this inspection. Recurrent and uncorrected violations are given additional weight in the consideration and selection of appropriate enforcement action. Therefore, in your response to this letter, you should give particular attention to those actions taken or planned to ensure that identified violations will be completely corrected and will not recur.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. These violations have been categorized by severity level in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register Notice (49 FR 8583) dated March 8, 1984. You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A. In addition to the need for corrective action regarding these specific violations, we are concerned about the implementation of your

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management control systems that permitted them to occur. Consequently, in your reply, you should describe in particular, those actions taken or planned to improve the effectiveness of your management control systems.

Sections of the enclosed inspection report contain details of your security program that have been determined to be exempt from public disclosure in accordance with either 10 CFR 73.21 (Safeguards Information) or 10 CFR 9.5(a)(4) (Commercial or Financial Information). Therefore, the sections so identified in the inspection report and Appendix A will not be placed in the NRC Public Document Room and will receive limited distribution. The inspection report cover sheet and any remaining portions of the inspection report will be placed in the Public Document Room, in accordance with 10 CFR 2.790(a), unless you notify, by telephone, the Supervisor, Files, Mail and Records, USNRC Region I, at (215) 337-5223, within 10 days of the date of this letter and submit written application to withhold information contained in the report within thirty days of the date of this letter. Such application must be consistent with the requirements of 10 CFR 2.790(b)(1).

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation with us in this matter is appreciated.

Sincerely,

Original Signed By:

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

Enclosures: (w/o Appendix A and Inspection Report paragraphs 2 b, 4, 6, 9,
10 and 14)

1. Appendix A, Notice of Violation (Contains Safeguards Information)
2. NRC Region I Inspection Report Number 50-293/84-22 (Paragraphs 2.b, 4, 6, 9, 10 and 14 contain Safeguards Information)

cc w/encl: (w/o Appendix A and Inspection Report paragraphs 2.b, 4, 6, 9,
10 and 14)

A. V. Morisi, Manager, Nuclear Management Services Department
C. J. Mathis, Station Manager
E. R. MacCormack, Sr. Regulatory Affairs and Programs Engineer
(w/Safeguards Information)
Joanne Shotwell, Assistant Attorney General
Paul Levy, Chairman, Department of Public 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 (w/Safeguards Information)
Commonwealth of Massachusetts (2)

bcc w/encl: (w/o Appendix A and Inspection Report paragraphs 2.b, 4, 6, 9,
10 and 14)

Region I Docket Room (with concurrences)
Senior Operations Officer (w/o encls)
Section Chief, DPRP

RI:DETP
Dunlap
10/8/84

RI:DETP
Keimig
10/8/84

RI:DETP
Joyner
10/15/84

RI:DETP
Martin
10/23/84

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