

SEP 24 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. 50-293/84-25

This refers to the special inspection conducted by Region I staff members on August 6-10, and 24, 1984, at the Pilgrim Nuclear Power Station, Plymouth, Massachusetts, of activities authorized by NRC License No. DPR-35 and to the discussion of our findings held with Mr. A. Oxsen at the conclusion of the inspection. This also refers to the Management Meeting held in NRC Region I, King of Prussia, Pennsylvania, on September 5, 1984.

Areas examined during this inspection and the details of the Management Meeting are described in the NRC Region I Inspection Report which is enclosed with this letter. The inspection of your Radiological Safety Program during the current outage at Pilgrim Station consisted of selective examinations of procedures and representative records, interviews with personnel, measurements made by the inspector, and observations by the inspector. We also examined the circumstances surrounding the August 18, 1984, unplanned extremity exposure of a worker.

Our review of the circumstances surrounding the August 18, 1984 unplanned extremity exposure of a worker indicates that inadequate surveys and inadequate communication and instructions to the worker were the prime causal factors resulting in the unplanned exposure. We note that a secondary cause was the inadequate attention to ALARA controls in the CRD Repair Room. The excessive radiation dose rates on tools and equipment in this room complicated the identification of highly radioactive chips found during and subsequent to the unplanned exposure. This is an apparent deviation from good ALARA practices. Although the worker did not receive exposures in excess of regulatory limits, we are concerned that the circumstances surrounding this event created a substantial potential for such exposures. The actual radiation levels on the radioactive chip handled by the worker were high enough so that it is fortuitous that an occupational exposure in excess of NRC regulations did not occur. We are particularly concerned that 12 similar chips, found throughout the room and including the area where this individual worked, were not identified prior to the event. We also noted that an unapproved procedure was being used to disassemble CRDs in the CRD Repair Room. Although this finding was identified by you, we are concerned with your lack of management controls that failed to identify the use of unapproved procedures. The apparent violations and the apparent deviation identified in our review of this event are discussed in the enclosed report. The need for and nature of appropriate enforcement action relative to the apparent violations and deviation will be the subject of separate correspondence at a later time.

8410260254 840924
PDR ADOCK 05000293
Q PDR

IE06/11

SEP 24 1984

Our inspector also attempted to verify the steps you have taken to correct the violations brought to your attention in the enclosure to our letter dated April 17, 1984. Our review found that although the documents you committed to establish as described in your May 17, 1984 response to our letter were established, we found that appropriate personnel were not being trained in the documents in an adequate manner. We attribute this to inadequate management attention to this area. Based on discussions at the Management Meeting, it is our understanding that all appropriate personnel have been instructed in the appropriate documents (i.e., procedure changes and memoranda) and that management attention has been directed to this important area.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). The telephone notification of your intent to request withholding, or any request for an extension of the 10 day period which you believe necessary should be made to the Supervisor, Files, Mail and Records, USNRC Region I at (215) 337-5223.

Sincerely,

Original Signed By:

R. BELLAMY

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

Enclosure:

NRC Region I Inspection Report No. 50-293/84-25

cc w/encl:

A. V. Morisi, Manager, Nuclear Management Services Department
C. J. Mathis, Station Manager
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
Commonwealth of Massachusetts (2)

SEP 24 1984

bcc w/encl:
Region I Docket Room (with concurrences)
Section Chief, DPRP
D. J. Holody

RI:DETP
Nimitz/sm
9/17/84
27-,end

RLW
9/17/84

WP
RI:DETP
Pasciak
9/17/84

fed
RI:DETP
L.Tripp
9/19/84

mt
RI:DETP
Bellamy
9/19/84

~~RI:DETP
T.Martin
28-9/ /84~~

OFFICIAL RECORD COPY

DL50-293/84-25 - 0003.0.0
09/17/84