April 24, 1996

E. Thomas Boulette, PhD Senior Vice President - Nuclear Boston Edison Company Pilgrim Nuclear Power Station 600 Rocky Hill Road Plymouth, Massachusetts 02360-5599

SUBJECT: MANAGEMENT MEETING ON CENTRALIZED EMERGENCY PREPAREDNESS GROUP (CEPG)

Dear Mr. Boulette:

On April 17, 1996, Mr. Vern Oheim and other members of your staff met with members of NRC Region I and NRR in King of Prussia, Pennsylvania, to discuss the utilization of the proposed CEPG. A list of the meeting attendees is provided as Enclosure 1. The CEPG is a Yankee Atomic organization that will provide support, under contract to the Boston Edison Company (BECo), for the implementation of the Pilgrim Nuclear Power Station (PNPS) Emergency Preparedness (EP) Program.

Major items discussed during the meeting were the proposed organizational structures, transition plan to the CEPG, and the continuing program selfassessments to ensure that there is no decrease in the effectiveness of the program. We also discussed your recent efforts to compile all EP program commitments to ensure that none would be overlooked with the implementation of the CEPG. Your staff emphasized its recognition that BECo remains responsible for the management and implementation of the PNPS EP program. It also emphasized that the quality of and support to the EP program would not decrease. A copy of the information provided by your staff at the meeting is provided as Enclosure 2.

We requested that the 10 CFR 50.54(q) evaluation(s) for the PNPS Emergency Plan changes required for the implementation of the CEPG be submitted to the NRC to facilitate a review in our office.

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#### E. Thomas Boulette, PhD

We believe that the meeting was beneficial to our understanding of the planned changes and their implementation. No response to this letter is required. Your cooperation with us is appreciated.

Sincerely,

(original signed by)

Richard R. Keimig, Chief Emergency Preparedness and Safeguards Branch Division of Reactor Safety

Docket No. 50-293 Enclosure: As stated cc w/encl: L. Olivier, Vice President - Nuclear and Station Director T. Sullivan, Plant Department Manager N. Desmond, Regulatory Relations D. Tarantino, Nuclear Information Manager R. Hallisey, Department of Public Health, Commonwealth of Massachusetts The Honorable Therese Murray The Honorable Linda Teagan B. Abbanat, Department of Public Utilities Chairman, Plymouth Board of Selectmen Chairman, Duxbury Board of Selectmen Chairman, Nuclear Matters Committee Plymouth Civil Defense Director P. Gromer, Massachusetts Secretary of Energy Resources B. Cronin, Legislative Assistant J. Fleming A. Nogee, MASSPIRG Regional Administrator, FEMA Office of the Commissioner, Massachusetts Department of Environmental Quality Engineering Office of the Attorney General, Commonwealth of Massachusetts T. Rapone, Massachusetts Executive Office of Public Safety Chairman, Citizens Urging Responsible Energy Commonwealth of Massachusetts, SLO Designee Distribution w/encl: Region I Docket Room (with concurrences) PUBLIC Nuclear Safety Information Center (NSIC) NRC Resident Inspector R. Conte, DRP H. Eichenholz, DRP C. O'Daniell, DRP

DRS File

E. Thomas Boulette, PhD

Distribution w/encl (Cont'd): S. Shankman, NRR

R. Eaton, NRR M. Davis, NRR W. Dean, OEDO Inspection Program Branch, NRR (IPAS)

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OFFICIAL RECORD COPY

#### Enclosure 1

#### MEETING ATTENDANCE

#### Boston Edison Employees

- H. Oheim, General Manager Technical Section

- N. Desmond, Regulatory Relations Manager R. Markovich, Offsite Emergency Preparedness Manager J. Spangler, Onsite Emergency Preparedness division Manager D. Tarantion, Manager Public Affairs

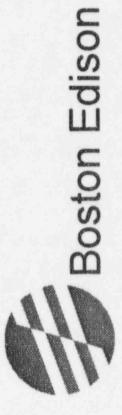
#### NRC Employees

- R. Keimig, Chief, Emergency preparedness and Safeguards Branch R. Conte, Chief, Project Branch 5
- R. Gibbs, Reactor Engineer, Project Branch 5
- F. Kantor, Emergency Preparedness Specialist, NRR/DRPM/PERB
- J. Lusher, Emergency Preparedness Specialist, Region I

ENCLOSURE 2

# EMERGENCY PREPAREDNESS PROPOSED CENTRALIZED GROUP

April 17, 1996





#### PROPOSED CENTRALIZED EMERGENCY PREPAREDNESS GROUP (CEPG)

- INTRODUCTION
- ORGANIZATION STRUCTURE AND MATRIX
- CEPG TRANSITION PLAN
- CURRENT SELF ASSESSMENT
- CONTINUED SELF ASSESSMENT

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# INTRODUCTION

#### **Objectives**

- Continued improvement of an effective EP program
- Enhance EP staffing
- Responsive to competitive environment



# INTRODUCTION

#### Concept

- PNPS EP program ownership retained by Boston Edison
- Dedicated core management staff maintained at PNPS
- CEPG staff consisting of experienced utility EP staff
- PNPS ERO staffed by senior experienced personnel



## INTRODUCTION

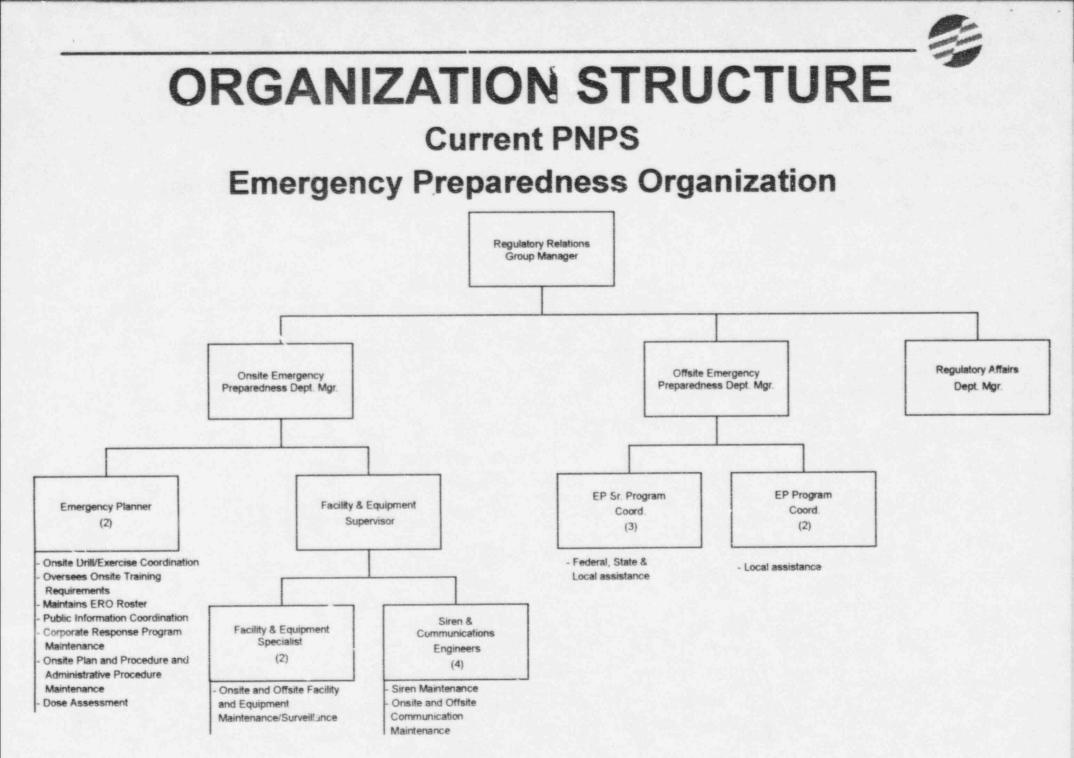
#### Advantages

- Access to larger resource pool to meet routine/actual EP needs
- Program continuity with greater flexibility
- Allows for future standardization of procedures and processes



# CONTINUED PNPS EP PROGRAM FUNDING

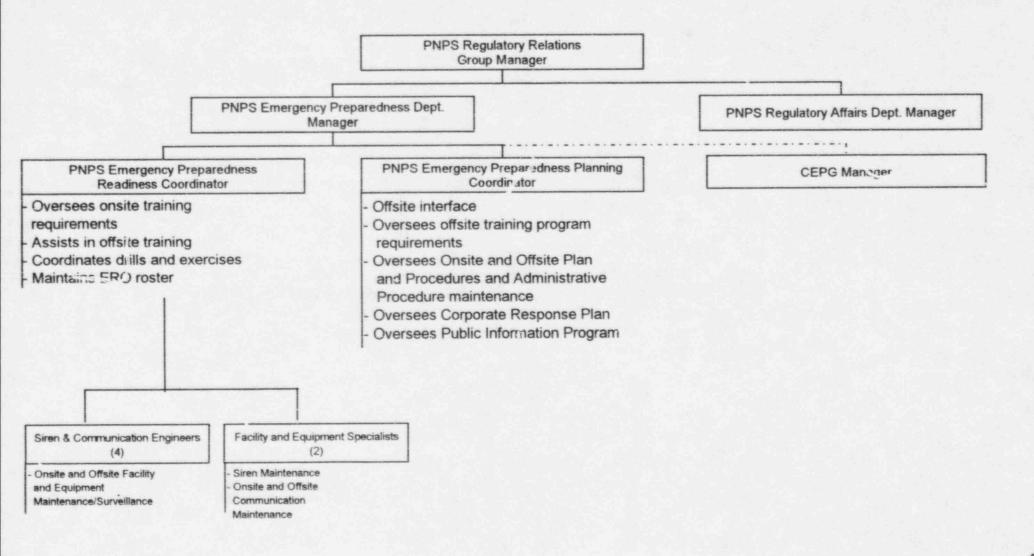
- Annual MEMA Grant
- Annual MDPH Grant
- Annual Local Grants
  - Civil Defense Comprehensive Grant Agreement
  - Civil Defense Grant Agreement
- MEMA Offsite ERO Training Instructor Pool





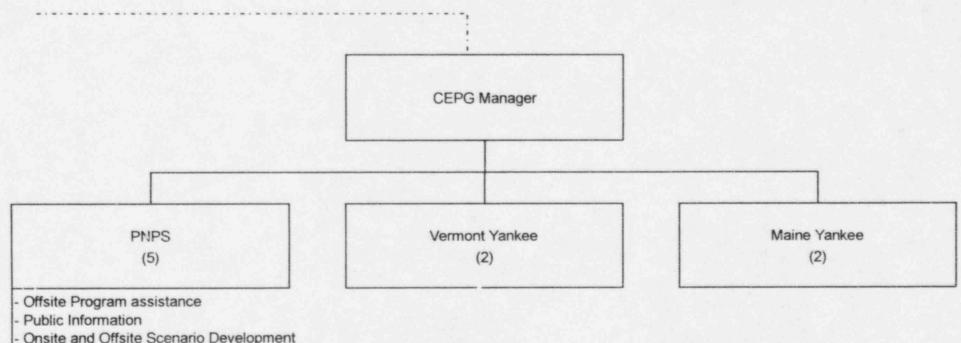
## **ORGANIZATION STRUCTURE**

#### **Proposed Emergency Preparedness Organization**



## **ORGANIZATION STRUCTURE**

#### Proposed PNPS/Centralized Emergency Preparedness Organization



- Plan and Procedures and Administrative

Procedure maintenance

Training material review



#### 1995 CHANGES PROVIDE CEPG OPPORTUNITY

- Improved Plan and Implementing Procedure maintenance process
- Strengthened Offsite Training Program
- Expanded Offsite Training Instructor Pool
- Improved Offsite Drill and Exercise Scenario Development Process



### PNPS AND CEPG EP MATRIX

- Identifies major Onsite and Offsite EP Program tasks
- Identifies primary and secondary implementation responsibility



## **TRANSITION PLAN FOR KEY ACTIONS**

- Staffing and Employment
  - Selection of highly qualified personnel
- Organization and Interface
  - Contractual
  - Discussions with regulator and offsite agencies
  - Program documents review/revision
- Logistics
  - Location of staff
  - Facility/hardware needs



# **CEPG TRANSITION PLAN**

#### Program and Processes

- Performance standards
- Program self assessment
- 50.54(q)

### **CURRENT SELF-ASSESSMENT**

#### **Document/Commitment Review**

- 1987 1988 Startup documents
- PNPS EP Grant Agreements:
  - Grant Agreement and MEMA Staff Funding Documentation, January 4, 1993
  - Grant Agreements: Local Comprehensive and Maintenance
- PNPS Response to September 6, 1990, Public Meeting dated October 4, 1990



# **CURRENT SELF-ASSESSMENT**

Document/Commitment Review (cont'd)

- NUREG-1438 Findings on Issues of Offsite Emergency Preparedness for Pilgrim Nuclear Power Station, dated June 1991 (and Appendices)
- PNPS Internal Commitment Tracking Systems
- NRC Inspection Reports



#### **CURRENT SELF-ASSESSMENT**

Document/Commitment Review (cont'd)

- PNPS E-Plan and procedures
- PNPS Offsite E-Plan and procedures
- PNPS Annual QA Audits
- PNPS NRC and FEMA EP Exercise Reports
- PNPS miscellaneous EP correspondence

# CURRENT SELF-ASSESSMENT Results

- Issues:
  - Maintains PNPS EP Training and Planning Programs
  - Support to Offsite EP Training and Planning Programs
- Findings:
  - Proposed plan supports program elements
    - Agreements
    - Funding
  - Many obsolete program commitments identified



## **CONTINUED SELF-ASSESSMENT**

- PNPS performance standards established
- PNPS performance indicators monitor progress
- Monthly MEMA Area II EP meetings provide offsite program feedback

## CONCLUSION

- Continued effective program
- PNPS retains ownership of EP program
- CEPG provides access to a larger resource pool