

NOV 7 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: 50-293/84-13

This refers to your letter dated July 6, 1984, in response to our letter dated June 8, 1984.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

With reference to your response to Notice of Violation (84-13-01), your Technical Specification 6.8.A incorporates the requirements contained in Appendix A of Regulatory Guide 1.33 in requiring procedures for your liquid and solid radwaste systems. The three contractor procedures specified in the Notice of Violation were associated with your solid radwaste system. It is our understanding that your present practice is that Boston Edison Waste Management personnel review contractor procedures for technical appropriateness and congruence with parent Boston Edison procedures. You have also indicated that it is your belief that Boston Edison Waste Management personnel are able to provide equivalent assurance of adequacy of vendor procedures and activities.

We have determined that the proper action for this office is to discuss the proposed notice of violation, and your response and position, with other offices inside the NRC, and reach an NRC position applicable to all licensees regarding review and approval of vendor procedures. We will advise you of the outcome of this effort. At this time, we are withdrawing the violation, and classifying the concern as an open item.

With respect to the first part of Notice of Violation (84-13-02), we withdraw this part of the violation based upon the information you provided. We have no further questions regarding your decay heat determination. We will modify our records to indicate this.

With regard to the second part of Notice of Violation (84-13-02), experience has demonstrated in at least two instances during 1983 that shipments such as that made on February 10, 1984, LSA dewatered resin in package No. 8-120 (Certificate of Compliance No. 6601), have been subjected to exothermic reactions. Although the cause of these exothermic reactions are uncertain as to waste form at this time, the generation of gases was confirmed.

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You stated, in part, that:

"... since not only the cask in question, but all casks are de-watered to comply with burial site criteria, our packages do not contain residual water as Condition 10 states. Secondly, Condition 10 specifies that (tests must be conducted on packages which) contain substances which could radiolytically generate combustible gases. It is our position that our casks do not fall under this second category since (1) Pilgrim Station does not use Nitrites nor Nitrates in their primary fluid process which could possibly cause an exothermic reaction, and (2) all our shipments are well below the  $10^6$  Rad which could generate hydrogen gases through the radiolytic breakdown of water."

It is our position that tests and measurements as required by Condition No. 10 of Certificate of Compliance No. 6601 are necessary to support your statement. You should review Certificate of Compliance No. 6601, Revision No. 18 which clearly states our concern with gas generation. This part of the violation remains unless you submit further documentation supporting your statements.

With reference to your response to Notice of Deviation (84-13-04), in your response to IE Bulletin 79-19 dated October 2, 1979, you committed to training and periodic retraining programs as required by the Bulletin. During Inspection 50-293/82-06 in February 1982, it was identified that you had not developed and implemented training and periodic retraining programs for personnel involved in the transfer, packaging and transport of radioactive material.

In your letter to the Commission dated July 19, 1982 (BECo Ltr. #82-196) in response to Inspection Report 50-293/82-06 you stated, "We are in the process of developing the associated course content, lesson plans and a training schedule. This process is scheduled for completion by January 1, 1983, and full compliance shall be achieved at that date." Since full compliance includes training, our interpretation of your response was that course content, lesson plans, a schedule for training and actual training would be accomplished by January 1, 1983. Training did not take place prior to January 1, 1983, and in fact no training took place until June 1983, almost 14 months after the problem was identified, and almost 4 years after the issuance of IE Bulletin 79-19. Further, as of April 1984, training had not been given to all transportation workers required to have training. Since your actions fell short of your commitment, the Notice of Deviation remains. We have reviewed your subsequent response and corrective actions to the Notice of Deviation and have no further questions at this time. This item will be reviewed during a future inspection of your licensed activities.

With reference to your response to the Notice of Violation (84-13-03), we have no further questions.

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In summary, pursuant to the provisions of 10 CFR 2.201, Boston Edison Company is required to submit to this office within thirty days of the date of this letter, a written statement or explanation in reply regarding Notice of Violation Item B2 attached to the June 8, 1984, letter to Boston Edison Company.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

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

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)

bcc w/encl:

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

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 RI:DETP  
 Clemons/gcb  
 10/17/84

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 Pasciak  
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 Bellamy  
 10/22/84

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 Martin  
 11/5/84