

BOSTON EDISON COMPANY  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

December 7, 1984  
BECo Ltr. #84-206

Mr. Thomas T. Martin  
Division of Engineering and Technical Programs  
U.S. Nuclear Regulatory Commission  
Region I - 631 Park Avenue  
King of Prussia, PA 19406

Docket Number 50-293  
License DPR-35

Subject: Inspection 84-13

References: (a) NRC Letter to Boston Edison, dated June 8, 1984  
(b) Boston Edison Response to NRC, dated July 6, 1984  
(c) NRC Letter to Boston Edison, dated November 7, 1984

Dear Mr. Martin:

This letter is in response to Reference (c), which requires a revised response to Notice of Violation, Item B.2. Per your suggestion, we have re-reviewed Certificate of Compliance No. 6601 (Rev. 18) in light of your concerns regarding gas generation. As a result of that review, we have reached the same conclusions and position that we originally stated in Reference (b), in that we have not witnessed exothermic reactions in the course of our particular waste shipment activities, and we maintain that we should never see occurrence of that phenomenon based on (1) our plant chemistry, and (2) the low level of activity of our waste relative to the activity levels normally required to radiolytically generate gases.

However, in order to improve our administrative controls in the area of cask handling and preparation prior to shipment, we have recently revised the appropriate Boston Edison procedures to directly incorporate the specific Certificate of Compliance used in each shipment and to require adherence to the requirements of that Certificate of Compliance by the shipment preparer. Therefore, we feel that the above procedural revisions adequately address not only the issue of gas generation, but all issues of concern that are referred to in the conditions of the Certificate of Compliance.

The second purpose of this letter is to modify a statement made to you in Reference (b) regarding our plans to complete 79-19 training by December 31st of this year. Due to the extensive manpower demands of the outage, this date has now become unrealistic. We now anticipate that 79-19 training will be completed within ninety days of plant startup. According to current outage projections, we therefore anticipate completion of this training by March 31, 1985.

8412190285 841207  
PDR ADOCK 05000293  
G PDR

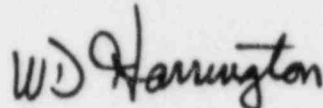
IE06  
1/0

BOSTON EDISON COMPANY

Mr. Thomas T. Martin  
U.S. Nuclear Regulatory Commission  
December 7, 1984  
Page Two

If you have any further questions or require additional information regarding the above issues, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink that reads "WD Harrington". The initials "WD" are written in a large, stylized font, and the name "Harrington" is written in a cursive script.

William D. Harrington