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SENIOR VICE PRESIDENT
NUCLEAR

December 28, 1984
BECo Ltr. #84-216

Dr. Thomas Murley, Regional Administrator
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region I - 631 Park Avenue
King of Prussia, PA 19406

Docket Number 50-293
License DPR-35

Response to Notice of Deviation

Reference: (a) NRC Letter to Boston Edison Co., dtd. Nov. 29, 1984

Dear Dr. Murley:

This letter is in response to the Notice of Deviation transmitted to Boston Edison Company as Appendix B to the referenced letter.

Notice of Deviation

10CFR20.1(c) states in part. "Persons engaged in activities under licenses issued by the Nuclear Regulatory Commission...should, in addition to complying with the requirements set forth in this part, make every reasonable effort to maintain radiation exposures...as low as reasonably achievable." Regulatory Guide 8.8, "Information Relevant to Ensuring That Occupational Radiation Exposures at Nuclear Power Stations Would Be As Low As Is Reasonably Achievable," dated June 1978, states in part in Section C.3.b.: "During operations in radiation areas, adequate supervision and radiation protection surveillance should be provided to ensure that the appropriate procedures are followed, that planned precautions are observed, and that all potential radiation hazards that might develop or that might be recognized during the operation are addressed in a timely and appropriate manner."

Contrary to the above, on August 18, 1984, and for an undetermined period of time prior to this date, workers disassembling Control Rod Drives in the CRD Repair Room routinely used tools with recognized contact radiation dose rates of up to 1,000 mrem/hour, and no timely and appropriate action was taken by radiation protection personnel to preclude unnecessary exposure of workers using the tools.

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The GE procedure that was improperly being used to disassemble the CRD's does not specifically speak to radiation or contamination levels. However, PNPS Procedure 3.M.4-1.1, Rev. 2, required the following in Section VII.C:

NOTE

"1. After flushing is completed, the area is to be decontaminated and all contaminated material properly disposed of."

Even though flushing is "optional," the decontamination and disposal of material should have been conducted following the completion of the disassembly of a CRD.

The ALARA review of RWP No. 84-1669, "Dismantle CRD," did not speak specifically to contaminated tools. Additionally, the HP technician assigned to the CRD Repair Room did not instruct workers on proper ALARA procedure; i.e., tool decontamination.

In summary, failure to maintain exposures ALARA during CRD disassembly was a breakdown of several elements of the radiation protection program.

The following actions were taken to correct the condition:

Upon learning of the incident on August 18, 1984, BECo management immediately suspended all work in the CRD Repair Room. The CRD Repair Room was decontaminated, and sources of radiation were either removed and properly disposed of or were shielded.

The following actions were taken to prevent recurrence:

- An in-depth ALARA review of the CRD disassembly/reassembly activity was conducted.
- PNPS Procedure 3.M.4-1.1 was revised to include maximum allowable contamination levels for tools and to establish radiation and contamination action levels to limit the build-up of background in the CRD Repair Room.
- The RWP for CRD disassembly was revised to require one-on-one health physics technician-to-worker coverage. It was also revised to require health physics technician survey and approval prior to the handling of any tool.

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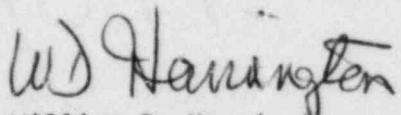
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- Training of all GE and craft personnel on the revised procedure and on the hazards involved in handling small, highly radioactive sources was conducted.

All of the above actions were completed on or before resumption of CRD dismantling activities on September 17, 1984.

If you should have any further questions on this subject, please do not hesitate to contact me.

Sincerely,


William D. Harrington