



Michael S. Dukakis
Governor

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The Commonwealth of Massachusetts

Executive Office of Public Safety

One Ashburton Place

Boston, Massachusetts 02108

September 6, 1988

Samuel J. Collins, Deputy Director
Division of Reactor Projects
N.R.C. Region One
475 Allendale Road
King of Prussia, Pa. 19406

Dear Mr. Collins:

This is in reply to your letter dated September 1, 1988, regarding the Commonwealth's participation in the recently completed IATI inspection at Pilgrim Station.

The Commonwealth's observers, Mr. Sholly and Ms. Chan, generally concur with the findings of the IATI team. The Commonwealth's observers followed the prescriptions of paragraph three of the "Guidelines For Accompaniment On The Integrated Assessment Team Inspection" by communicating their observations, concerns and comments about matters considered during the inspection to appropriate N.R.C. personnel during the inspection. The only additional comment we wish to add about the IATI at this time is a recommendation by Mr. Sholly, that in view of the difficulty in one case with implementation of a satellite EOP, that there should be an effort to validate all new plant procedures before restart. Any specific reaction we may have to the written IATI report will, of course, have to await our review of the document.

However, as I pointed out during the recent S.A.L.P. meeting, the Commonwealth reserves the right to disagree with the conclusions drawn by the N.R.C. or the licensee about the IATI findings. For example, notwithstanding what might be considered unmistakable evidence of progress by Boston Edison Company, the Commonwealth remains skeptical of the licensee's readiness to restart at this time. In addition to our concerns about offsite emergency preparedness which have been outlined recently in letters to Mr. Henry Vickers of F.E.M.A., Regional Administrator William Russell, and to the A.C.R.S. Ad Hoc Subcommittee on the restart of Pilgrim, the Commonwealth is concerned that mediocre scores by the licensee during the last

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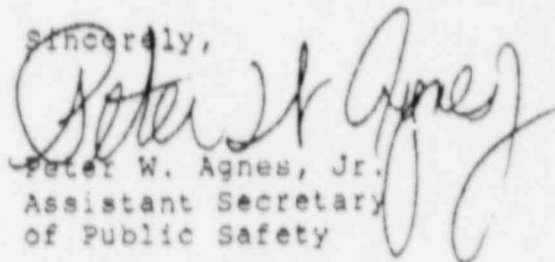
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S.A.L.P. period coupled with a history of poor performance by the licensee have not been taken seriously enough in the staff's evaluation of readiness to restart. If the licensee is unable to achieve S.A.L.P. scores that even equal the national average for licensed commercial nuclear power plants in this country while Pilgrim remains shutdown, why should we believe that the plant is ready to restart?

Some of our other concerns, which transcend the scope of the IATI, are outlined in our letter to the A.C.R.S., a copy of which will be forwarded to you tomorrow.

We appreciate your acknowledgment of the professional sm exhibited by Mr. Sholly and Ms. Chan during the IATI and the cooperation extended to them by the team members and the licensee.

Sincerely,



Peter W. Agnes, Jr.
Assistant Secretary
of Public Safety

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