



BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

May 26, 1988
BECO. #88-086

Ralph G. Bird
Senior Vice President — Nuclear

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

License DPR-35
Docket No. 50-293

Dear Sir:

We have reviewed your letter of April 29, 1988 containing the NRC response to Senator Kennedy's questions regarding Pilgrim Station. No corrections or additions are proposed.

For your information, we have enclosed a copy of our letter to Senator Kennedy's office providing responses to questions from various citizens groups in the Plymouth area.

Very truly yours,


R. G. Bird

RGB/mg

Enclosure

cc: Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Station P1-137
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Mr. D. McDonald, Project Manager
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BOSTON EDISON
800 Boylston Street
Boston, Massachusetts 02199

May 3, 1988

Ms. Kathleen R. Anderson
Massachusetts Legislative Director
Senator Edward Kennedy's Office
J. F. Kennedy Federal Building
Boston, MA 02203

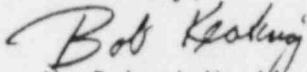
Dear Kathy:

Per our discussion and your letter of February 23, 1988 I am happy to provide you with answers to the list of questions which were prepared by various citizen groups in the Plymouth area and submitted to your office for a coordinated response.

I apologize for the delay in getting this information to you even though you indicated there was not an immediate rush. I hope these answers are helpful and should you have any additional questions please do not hesitate to call me.

On another subject, now that the weather is getting a little better, I am hoping to schedule a tour of some of our fossil fired power plants and will be giving you a call should you or other staff members care to visit and observe one of these facilities.

Sincerely,


W. Robert Keating

WRK/cac
Attachment

bcc: C. Gustin
D. Horan
L. MacDonald
E. Robinson

ATTACHMENT 1

General Topic

I. Health Issues

Reference: Page 3

Question #6:

Boston Edison undertook a study of their employees and former employees health status. Is this study completed? Does it have preliminary findings? Will it be shared with the MDPH?

Answer:

Boston Edison plans to participate in a large scale study of utility radiation workers. This study will not be confined to BECo. but will include participation by as many other utilities as possible to maximize the number of people and the total radiation exposure considered. The proposed study would be sponsored by the Electric Power Research Institute (EPRI). EPRI's membership includes most electric utilities in the United States and the initial response by potential participating utilities has been very encouraging.

Question #8:

Reference: Page 3

CURE reported allegations to the NRC last summer regarding the removal of shrubbery onsite at Pilgrim which was said to be radioactive. The NRC said that the licensee stated the bushes were removed for security reasons. They later admitted that there was some amount of radioactivity and would investigate the matter. How do bushes at Pilgrim become radioactive? Where were they taken? Were appropriate surveys conducted?

Answer:

During 1987 some shrubbery was removed from the area in front of the original administration building on the Pilgrim station site. These bushes were properly surveyed prior to release and determined to be uncontaminated in accordance with criteria consistent with that established by the NRC for release of material for unrestricted use. These bushes were taken to a landfill area on BECo. property located about 1/2 mile southwest of the site. As a result of allegations from an unidentified source, some of these bushes were retracted and reanalyzed using an even more sensitive survey technique. This reanalysis indicated that extremely small amounts of radioactive material were present in the residual dirt attached to the roots of the plants. The amount of radioactive material was below the sensitivity established for surveys and measurements performed to release such material offsite. Radioactive material was not present in quantities above levels that are considered contaminated.

The radioactivity found was the result of long term buildup in the soil.

ATTACHMENT 1

General Topic

II. Fire Protection

Question #1:

Reference: Page 5

Is BECO now in full compliance with Appendix "R" requirements in fire protection? Have they applied for any waivers?

Answer:

Most Appendix R work is now physically complete, although the paperwork to closeout some items is not yet done.

Question #2:

Reference: Page 5

Are all barriers, fire doors and penetration seals repaired and capable of passing required testing?

Answer:

As of March 17, 1988, the major work scheduled in RFO#7 on barriers, fire doors, and penetration seals has been completed and tested satisfactorily. Paper closeout continues, as does work on repairs identified in the normal course of operation.

Question #3:

Reference: Page 5

In February 1986, 72 locations at Pilgrim were being observed by firewatches because of unfinished maintenance in the area of fire protection. How many were being observed on January 1, 1988?

Answer:

Firewatches are mandated by the NRC to be in place during maintenance on many systems other than those related to fire protection. Moreover, during the outage additional firewatches were established beyond those required by law based on conservative judgment, to provide the additional margin of safety during the heavy workload.

- a. On January 1, 1988, there were 142 fire watch postings supporting the outage. Today (3/30/88), however, there are only 36 fire watch postings which are checked hourly. The number of fire watch postings decreases as the amount of work requiring fire watches decreases.

ATTACHMENT 1

General Topic

II. Fire Protection (cont.)

Question #4:

Reference: Page 5

Is the water pressure from the Town of Plymouth adequate to fight a fire on the second floor of Pilgrim Station?

Answer:

Pilgrim Station has its own fire water storage tanks totaling a half million gallons. There are two fire pumps, each of which provides 2000 gallons per minute at 125 psig pressure. One of the fire pumps is diesel driven in case of loss of electric power. The Plymouth water supply is relied upon merely to replenish the storage tanks, not fight fires.

Question #5:

Reference: Page 5

The Standby Gas Treatment deluge system has been reported to be inoperative since 1984 because it requires an outage to test it. Has this matter been resolved during the current outage? If not, why not?

Answer:

The SBTG deluge was tested and is operational.

Question #6:

Reference: Page 5

The Halon System in the Computer Room is reported to have been inoperable since March, 1985 because there is no procedure to test it. Why is there no procedure? When will there be one?

Answer:

The Computer Room Halon System is functional. There is a procedure to test it and it will be tested prior to restart.

ATTACHMENT 1

General Topic

II. Fire Protection (cont.)

Question #7:

Reference: Page 5

What procedures are in place to suppress a fire in the Computer Room since the Halon System is inoperative?

Answer:

The Halon System is functional. In addition a Special Fire Procedure governs fire suppression tactics for each area of the plant including the Computer Room. Firewatch Procedure 8.b.14 governs actions of the firewatch assigned during any system inoperability.

Question #8:

Reference: Page 5

The smoke detectors over the spent fuel pool have been inaccessible to test since May, 1984. BECo is said to be investigating acquiring a compact scissors lift to test those and other inaccessible detectors in April, 1985. Has it been acquired? Have they been tested since that time?

Answer:

All six smoke detectors in this location are accessible and they have all been tested.

Question #9:

Reference: Page 5

BECo documents reveal that some outstanding maintenance requests (MRs) in the area of fire protection, which were established several years ago, have been assigned 1987 MR numbers, giving the impression that they represent newly identified problems. Please list outstanding MRs in this area and the dates each MR was established.

Answer:

BECo is not aware of any effort to rewrite new MRs for older ones.

Attached is a list of open MRs as of April 1, 1988 for the Fire Protection System #33.

ATTACHMENT 1

General Topic

II. Fire Protection (cont.)

Question #10:

Reference: Page 5

CURE received a report that Pilgrim's on-site fire brigade was activated to investigate the sound of a small explosion and the smell of "something burning" on November 12, 1987 at the time of the power loss. Evidence has been shown to the Department of Public Safety and the Senate Committee. The NRC and BECO continue to deny these reports. What procedures were used by the NRC to investigate this allegation? Did outside NRC inspectors question who would have been assigned to the brigade at that time?

Answer:

BECO's fire brigade was not activated or placed on alert on November 12, 1987. There was a report to the on-duty Watch Engineer of a smell of smoke but an investigation could not confirm the suspicious odor or other signs of a fire.

BECO is not informed of NRC investigation procedures whether the NRC conducted an investigation, or to whom the NRC would have spoken in the course of such an investigation.

ATTACHMENT 1

General Topic
III. General Safety

Question:

Reference: Page 6

#6. On April 4, 1986, the Residual Heat Removal (RHR) A Loop was shutdown for repairs. Was the RHR A Loop repaired and operable on April 10, 1986?

Answer: The RHR A Loop was repaired and returned to service on April 8, 1986. It remained operable until the unit was shutdown on April 12, 1986.

Question:

Reference: Page 7

#14. Is the Standby Gas Treatment System activated by a power loss?

Answer: Yes

ATTACHMENT 1

General Topic

IV. Emergency Planning

Question #15:

Reference: Page 7

If direct torus venting were to be used, what is the range of dose rates at the exclusion zone boundary in the event of venting?

At what pressure would venting take place?

Answer:

As of March 31, 1988 BECo is not implementing the tie in of the direct torus vent modification which is under evaluation.

The direct torus vent would not be used under design basis accident conditions and therefore would not affect the dose rates at the exclusion zone boundary as reported in the Final Safety Analysis Report.

Question #5:

Reference: Page 8

BECo's KLD estimate study indicates that during a major snowstorm, 50% of all driveways will be plowed within 30 minutes. What is the basis for that judgement?

Answer:

The driveway snow clearance times set forth in the ETE (Table 4-5) were based upon the responses of persons in the Pilgrim area to the KLD telephone survey (ETE Appendix F, question 12A). 50% of those responding indicated that they could clear their driveways of 6-8 inches of snow in 30 minutes or less. In addition, it is important to note that the evacuation time estimates conservatively assume that the driveway snow clearance activity occurs sequentially rather than contemporaneously with other trip generation activities (see ETE p. 4-22), and that in order to facilitate an evacuation, it is only necessary to clear sufficient snow to enable the vehicle to pass. Complete clearance would not be necessary.

ATTACHMENT 1

General Topic

IV. Emergency Planning (cont.)

Question #8:

Reference: Page 8

Why has BECo's Bus Shelter Survey not been made available to communities in the EPZ?

Answer:

There is to the best of our knowledge no document entitled "Bus Shelter Survey". The August, 1987 Stone & Webster Engineering Corporation "Study to Identify Potential Shelters in the EPZ Coastline Region of the Pilgrim Nuclear Power Station" has been widely distributed and a revision of that report is under preparation.

A report entitled "Pilgrim Nuclear Power Station Bus Response Capability Study" dated March, 1987 was prepared for Boston Edison. The report has not been widely distributed because it principally provides only raw data on transportation providers within a 40 mile radius of Pilgrim Station and does not represent either a listing of vehicles that would actually be available in an emergency, or an identification of providers that have agreed to participate in the emergency preparedness program. The report was utilized very early in the planning process as a simple reference list or "directory" of transportation providers.