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April 4, 1988 BECo Ltr. #88-065

Docket No. 50.293 License No. DPR-35

Dear Sir,

Ralph G. Bird

Senior Vice President - Nuclear

475 Allendale Road

Samuel J. Collins, Deputy Director

U.S. Nuclear Regulatory Commission

Division of Reactor Projects

King of Prussia, PA 19406

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Attached are the Boston Edison Company responses to the allegations described in your letter dated March 4, 1988. These allegations are that (A) Health Physics survey records were changed to preclude having to perform additional surveys, and (B) contaminated resins have been improperly disposed of on site.

Please do not hesitate to contact me directly if you have any questions.

BOSTON EDISON

Pilgrim Nuclear Power Station

Rocky Hill Road

Plymouth, Massachusetts 02360

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Attachment I: Response to Allegation A Attachment II: Response to Allegation B

cc:

Sr. Resident Inspector - Pilgrim Station

Information in this record was deleted in accordance with the Eccedom of Information Act, exemptions 7/9 FOIA 88-84

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Attachment II

Response to Allegation B

Boston Edison Company Pilgrim Nuclear Power Station Docket No. 50-293 License No. DPR-35

Description of Allegation B

On January 26, 1988 the following allegation was described to the Pilgrim Station Chief Radiological Engineer by the NRC Senior Resident Inspector. The source of the allegation was not revealed.

In 1981 and 1982 resins were released within the protected area. Those resins were buried in the area of the present pile of excavated material located on Pilgrim Site property, beyond the protected area.

Pesponse

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Over the last several ,ears during onsite excavation for plant modifications, dirt, asphalt, and concrete containing low levels of radioactivity have been stored in a fenced in area outside the protected area on Pilgrim Site property. The material has not been removed from Pilgrim Site because of the low levels of detected radioactivity.

The storage area now contains approximately 110,000 cubic feet of material with an estimated total activity of 2.3 millicuries. The predominant isotopes identified include cobalt-60 and cesium-137.

Since initial operation in 1972, events involving inadvertent releases of radioactive material within the protected area have occurred. These events have contributed to the activity of the material excavated from the protected area.

On January 17, 1981, radioactive resin from the condensate demineralizer was released via the Resin Addition Room to the station yard within the protected area. The resin was collected along with the snow and slush present at the time and placed in 6x6 shipping casks. These casks were moved to the Turbine Deck to thaw pending further waste processing.

On June 11, 1982, radioactive resin was observed on top of the Condenser Retube Building. Investigations revealed that approximately one half cubic foot of resin had migrated from the Condensate Demineralizer Vent System to Contaminated Exhaust and was released via the Reactor Building Vent. The radioactive resin was collected using vacuum cleaners with HEPA filtration.

We believe that the collected material from these events was disposed of properly. However, the self shielding effects of the pile of excavated material prevents the use of analytical measurements to conclude that no resin is buried within the pile.

The pile of excavated material will be relocated to establish a one hundred foot buffer zone to wetland areas. During the material relocation, radiation measurements will be taken with instrumentation capable of detecting activity concentrations that would be indicative of buried radioactive resin.