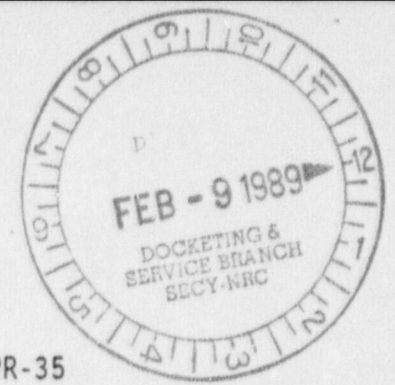


51-DD-88-21

DOCKET NUMBER 50-293 (2.206)



DEC 21 1988

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Docket No. 50-293

License No. DPR-35

Boston Edison Company
ATTN: Mr. Ralph G. Bird
Senior Vice President - Nuclear
Pilgrim Nuclear Power Station
RFD #1, Rocky Hill Road
Plymouth, Massachusetts 02360

Gentlemen:

Subject: Inspection No. 50-293/88-36

A routine safety inspection of your annual emergency preparedness exercise was conducted by Mr. C. Conklin of this office on December 12-14, 1988 at your Pilgrim Nuclear Power Station, Plymouth, Massachusetts. Discussions of our findings were presented by Mr. Conklin to you and other members of your staff at the conclusion of the inspection.

Areas examined during this inspection are described in the NRC Region I Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, observations by the inspector, and follow-up of findings identified during previous emergency preparedness inspections and exercises.

Within the scope of this inspection, no violations were identified. It was determined that your emergency response actions were adequate to provide protective measures for the health and safety of the public.

No reply to this letter is required. Your cooperation with us in this matter is appreciated.

Sincerely,
Original Signed By:
Ronald R. Bellamy, Chief
Facilities Radiological Safety
and Safeguards Branch
Division of Radiation Safety
and Safeguards

Enclosures:
1. NRC Region I Inspection Report No. 50-293/88-36

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cc w/encl:

K. Highfill, Station Director
 R. Anderson, Plant Manager
 J. Keyes, Licensing Division Manager
 E. D. Robinson, Nuclear Information Manager
 R. N. Swanson, Nuclear Engineering Department Manager
 The Honorable E. J. Markey
 Senator Edward P. Kirby
 The Honorable Peter V. Forman
 B. McIntyre, Chairman, Department of Public Utilities
 Chairman, Plymouth Board of Selectmen
 Chairman, Duxbury Board of Selectmen
 Plymouth Civil Defense Director
 P. Agnes, Assistant Secretary of Public Safety, Commonwealth of Massachusetts
 S. Pollard, Massachusetts Secretary of Energy Resources
 R. Shimshak, MASSPIRG
 Public Document Room (PDR)
 Local Public Document Room (LPDR)
 Nuclear Safety Information Center (NSIC)
 NRC Resident Inspector
 Commonwealth of Massachusetts (2)

bcc w/encl:

Region I Docket Room (with Concurrences)
 Management Assistant, DRMA (w/o encl)
 R. Blough, DRP
 L. Doerflein, DRP
 D. McDonald, PM, NRR
 PAO
 Robert J. Bores, DRSS
 S. Collins, DRP

Conklin	Lazarus	<i>reilly</i> Bellamy
12/15/88	12/20/88	12/21/88

*ca**WJ*

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U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-293/88-36
Docket No. 50-293
License No. DPR-35 Priority _____ Category C
Licensee: Boston Edison Company
Pilgrim Nuclear Power Station
RFD #1, Rocky Hill Road
Plymouth, Massachusetts 02360
Facility Name: Pilgrim Nuclear Power Station
Inspection At: Plymouth, Massachusetts
Inspection Conducted: December 12-14, 1988

Inspector: *C. Conklin* 12/21/88
C. Conklin, Senior Emergency date
Preparedness Specialist, DRSS

W. Lazarus, EP Section Chief, DRSS
C. Warren, SRI Pilgrim
C. Carpenter, RI Pilgrim
R. Hogan, PEPB, NRR

Approved By: *W. J. Lazarus* 12/21/88
W. J. Lazarus, Chief, EPS, date
FRSSB, DRSS

Inspection Summary: Inspection on December 12-14, 1988, (Report No. 50-293/88-36)

Areas Inspected: A routine, announced emergency preparedness inspection and observation of the licensee's annual partial-participation emergency exercise performed on December 13, 1988. The inspection was performed by a team of five NRC Region I and headquarters personnel.

Results: No violations were identified. Emergency response actions were adequate to provide protective measures for the health and safety of the public.

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DETAILS

1.0 Persons Contacted

The following licensee representatives attended the exit meeting held on December 14, 1988.

R. Bird, Senior Vice President, Nuclear
K. Highfill, Station Director
R. Varley, Emergency Preparedness Manager
J. Morlino, Drill and Exercise Coordinator
E. Robinson, Nuclear Information Manager
P. Mastrangelo, Chief Operating Engineer
P. Hamilton, Compliance Division Manager
J. Alexander, Operations Section Manager
A. Lee, Onsite Emergency Preparedness Manager
J. Spangler, Emergency Preparedness Equipment and Facilities Manager

The inspector also interviewed and observed the activities of other licensee personnel.

2.0 Emergency Exercise

The Pilgrim Nuclear Power Station partial-participation exercise was conducted on December 13, 1988 from 0700 to 1430. The exercise was announced and during normal working hours. The Massachusetts Civil Defense Agency and Department of Public Health participated at the Emergency Operations Facility. Additionally, the local communities participated in notification activities and the Plymouth Fire Department responded to a simulated fire on site. The Federal Emergency Management Agency (FEMA) did not observe any activities.

2.1 Pre-Exercise Activities

Prior to the emergency exercise, NRC Region I and FEMA representatives held meetings and had telephone discussions with the licensee to discuss objectives, scope and content of the exercise scenario. As a result, minor changes were made in order to clarify certain objectives, revise certain portions of the scenario and ensure that the scenario provided the opportunity for the licensee to demonstrate the stated objectives as well as those areas previously identified by NRC and FEMA as in need of corrective action.

NRC observers attended a licensee briefing on December 12, 1988, and participated in discussions of emergency response actions expected during the exercise. The licensee's controllers were responsible for controlling exercise activities to prevent deviations from the scenario and to ensure that normal plant

Operations were not disrupted. The exercise scenario included the following events:

1. Unusual, increased leakage into Radwaste;
2. A fire in the "A" Diesel Generator room;
3. Loss of shutdown cooling flow;
4. Loss of coolant from the Residual Heat Removal (RHR) system;
5. Declaration of Unusual Event, Alert, and Site Area Emergency;
6. Calculation of potential off-site dose consequences; and
7. Evaluation of protective actions for EPZ communities.

2.2 Activities observed

During the conduct of the exercise, five NRC team members made observations of the activation and augmentation of the emergency organization, activation of emergency response facilities, and actions of emergency response personnel during the operation of the emergency response facilities. The following activities were observed:

1. Detection, classification, and assessment of scenario events;
2. Direction and coordination of the emergency response;
3. Augmentation of the emergency organization and response facility activation;
4. Notification of licensee personnel and offsite agencies of pertinent plant status information;
5. Communications information flow, and record keeping;
6. Assessment and projection of potential offsite radiological dose and consideration of protective actions;
7. Provisions for inplant radiation protection;
8. Performance of offsite and inplant radiological surveys;
9. Maintenance of site security and access control;
10. Performance of technical support, repair and corrective actions;
11. Fire Fighting practices;

12. Recovery and reentry;
13. Assembly, accountability, and evacuation of personnel; and
14. Preparation of information for dissemination at the Emergency News Center.

3.0 Exercise Observations

3.1 Exercise Strengths

The NRC team noted that the licensee's activation and augmentation of the emergency organization, activation of the emergency response facilities, and use of the facilities were generally consistent with their emergency response plan and implementing procedures. The team also noted the following actions of the emergency response organization that provided strong positive indication of their ability to cope with abnormal plant conditions and implement the emergency plan:

1. Very good command and control of all emergency response facilities (ERF's) was demonstrated;
2. Classification of events was timely and conservative;
3. Staff notification and augmentation, and subsequent ERF activation was timely;
4. Face to face and telephonic communications in the Control Room were excellent. The staff used repeat backs of orders to assure that they were correct, displayed very good drillsmanship and performed in a professional manner;
5. The fire brigade leader displayed excellent leadership and knowledge and provided timely and accurate information and support to the Plymcuth Fire Department personnel who responded to the simulated fire; and
6. The EOF staff performed a very good evaluation of conditions necessary to terminate the emergency and enter recovery.

3.2 Areas for Improvement

The NRC identified the following areas for improvement. Although these findings did not have a significant negative impact on overall performance during the exercise, they should be evaluated and corrected by the licensee. The licensee conducted an adequate self critique of the exercise that also identified these areas.

1. The procedure for notification of the Plymouth Fire Department is not clear as to when calls made are for information purposes or to request assistance.
2. The media center representative could have provided more explicit and detailed answers to posed questions.

4.0 Licensee Actions on Previously Identified Items

The following items were identified during previous inspections (Inspection Report No. 50-293/87-54). Based upon observations made by the NRC team during the exercise, the following open items were acceptably demonstrated and are closed:

(Closed) 50-293/87-54-03: Dose projections made on the portable computer did not agree with the projections made on the HP-85.

(CLOSED) 50-293/87-54-04: The TSC appeared to focus on implementation of a single activity or course of action when multiple options were available.

5.0 Licensee Critique

The NRC Team Leader attended the licensee's post exercise critique on December 14, 1988 during which the key licensee controllers discussed observations of the exercise. The critique was thorough and the licensee indicated that the observations would be evaluated and appropriate corrective actions taken.

6.0 Exit Meeting and NRC Critique

The NRC Team Leader met with the licensee representatives listed in Section 1 of this report at the end of the inspection. The Team Leader summarized the observations made during the exercise.

The licensee was informed that previously identified items were adequately addressed and no violations were observed. Although there were areas for improvement identified, the NRC team determined that within the scope and limitations of the scenario, the licensee's performance demonstrated that they could implement their Emergency Plan and Emergency Plan Implementing Procedures in a manner which would adequately provide protective measures for the health and safety of the public.

Licensee management acknowledged the findings and indicated they would evaluate the NRC comments and observations and make changes where appropriate.