



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

October 26, 1987

RWISSMAN

Docket No. 50-293

MEMORANDUM FOR: Steven A. Varga, Director  
Division of Reactor Projects-I/II  
Office of Nuclear Reactor Regulation

FROM: Frank J. Congel, Director  
Division of Radiation Protection  
and Emergency Preparedness, NRR

SUBJECT: PILGRIM EXERCISE EXEMPTION REQUEST

Enclosed is a draft response to the Boston Edison request for an exercise exemption for the Pilgrim Nuclear Power Station. Based on the good faith effort of the licensee to comply with the regulations and the extensive ongoing offsite emergency preparedness improvement efforts for Pilgrim, we support the granting of the exercise exemption regarding the conduct of a full participation exercise in 1987.

A handwritten signature in cursive script that reads "Frank J. Congel".

Frank J. Congel, Director  
Division of Radiation Protection  
and Emergency Preparedness, NRR

Enclosure: Pilgrim Exemption

CONTACT: Rosemary T. Hogan, NRR  
492-4866

8904270115 890419  
PDR FOIA  
JOHNSON88-198 PDR

I/96

Docket No. 50-293

Mr. Ralph G. Bird  
Senior Vice President-Nuclear  
Boston Edison Company  
800 Boylston Street  
Boston, Massachusetts 02199

SUBJECT: ISSUANCE OF EXEMPTION TO 10 CFR PART 50, APPENDIX E,  
SECTION IV.F.3 FOR THE PILGRIM NUCLEAR POWER STATION

Dear Mr. Bird:

The Nuclear Regulatory Commission has granted the enclosed Exemption regarding the conduct of a full participation emergency preparedness exercise for the Pilgrim Nuclear Power Station in 1987. The Exemption was granted in response to your letter dated September 17, 1987.

We find that granting the Exemption is authorized by law, will not present an undue risk to the public health and safety, is consistent with the common defense and security, and meets the special circumstances described in 10 CFR 50.12(a)(2)(v).

The Exemption has been forwarded to the Office of the Federal Register for publication.

Sincerely,

Steven A. Varga, Director  
Division of Reactor Projects-I/II  
Office of Nuclear Reactor Regulation

Enclosure:  
Exemption

cc w/enclosure:  
See next page

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of  
Boston Edison Company  
(Pilgrim Nuclear Power Station)

}  
}  
}

Docket No. 50-293

EXEMPTION

I.

Boston Edison Company (the licensee) is the holder of Facility Operating License No. DPR-35 which authorizes operation of Pilgrim Nuclear Power Station (the facility) at steady-state reactor power levels not in excess of 1098 megawatts thermal. The license provides, among other things, that it is subject to all rules, regulations and Orders of the Nuclear Regulatory Commission (the Commission or NRC) now or hereafter in effect. The facility consists of a boiling water reactor located at the licensee's site in Plymouth, Massachusetts.

II.

Section 50.54(q) of 10 CFR Part 50 requires a licensee authorized to operate a nuclear power reactor to follow and maintain in effect emergency plans which meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50. Section IV.F.3 of Appendix E requires that each licensee at each site shall exercise with offsite authorities such that the State and local government emergency plans for each operating reactor site are exercised biennially with full or partial participation

by States and local governments, within the plume exposure pathway Emergency Planning Zone (EPZ).

The NRC may grant exemptions from the requirements of the regulations which, pursuant to 10 CFR 50.12(a) are (1) authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security, and (2) present special circumstances. Section 50.12(d)(2)(v) of 10 CFR describes the special circumstances in that the exemption would provide only temporary relief from the applicable regulation and the licensee has made good faith efforts to comply with the regulation.

### III.

By letter dated September 17, 1987, the licensee requested a one-time exemption from the schedular requirements of Section IV.F.3 of Appendix E. The last biennial emergency preparedness exercise was a full participation exercise conducted at the Pilgrim Nuclear Power Station on September 5, 1985. The licensee requests that an exemption be granted to allow the next biennial exercise to be deferred from 1987 to the second quarter of 1988. The schedule for future biennial exercises will not be affected by this one-time exemption (i.e., the following biennial exercise will be held in 1989).

The licensee states that the Commonwealth of Massachusetts, the local governments within the EPZ and the two emergency reception center communities

are in the process, with the assistance of the licensee, of implementing numerous improvements in their offsite emergency preparedness programs. These improvements include revision of the emergency plans of the local governments and the Commonwealth, the development of associated procedures, the development and implementation of training programs for officials and emergency personnel, and the upgrading of Emergency Operation Centers. The licensee expects the work to continue through early 1988. The licensee has informed the NRC that in view of these extensive ongoing efforts, the Commonwealth and the local governments have indicated that they are not able to fully participate in an exercise during calendar year 1987. In addition, the licensee states that the proposed deferral has been discussed with the Commonwealth and local emergency response officials, and all of the parties have indicated that they support the proposal.

The activities to upgrade offsite emergency planning and preparedness are in response to a Federal Emergency Management Agency (FEMA) evaluation of the adequacy of offsite preparedness at Pilgrim. On September 5, 1986, FEMA informed the Commonwealth of Massachusetts that it was undertaking a self-initiated review of its September 29, 1982 Interim Finding on offsite emergency preparedness for the Pilgrim Nuclear Power Station because of concerns raised during meetings in the spring of 1986 and information received subsequent to those meetings from local officials, the Commonwealth, and other interested parties. Based on a review of the overall state of offsite emergency preparedness for Pilgrim, FEMA concluded, in an Interim Finding issued on August 4, 1987, that offsite radiological emergency planning and

preparedness for Massachusetts was inadequate to protect the health and safety of the public in the event of an accident at the Pilgrim Nuclear Power Station. The August 4, 1987 Interim Finding superseded the previous finding of adequacy contained in the Interim Finding of September 29, 1982.

FEMA identified six areas of major concern during the course of its review:

- Lack of evacuation plans for public and private schools and daycare centers.
- Lack of a reception center for people evacuating to the north.
- Lack of identifiable public shelters for the beach population.
- Inadequate planning for the evacuation of the special needs population.
- Inadequate planning for the evacuation of the transport dependent population.
- Overall lack of progress in planning and apparent diminution in emergency preparedness.

Boston Edison is assisting the Commonwealth and the local authorities in the improvement of their emergency response programs. These efforts have included an updated evacuation time estimate study and traffic management plan, a study to identify public shelters for protecting the beach population, and the identification of and provision for the special needs and transportation dependent populations within the EPZ. In addition, the licensee is providing professional planners to assist the local governments and the Commonwealth in upgrading their plans and in the development of a new training program for off-site emergency response personnel. Some training has been conducted to date and training will continue after the development of the new training program has been completed.

Onsite emergency preparedness has been evaluated by the NRC during inspections and exercises including the most recent onsite exercise conducted on December 10, 1986. The 1986 exercise included partial participation by the Commonwealth. The inspection report for the 1986 exercise documented that Boston Edison's emergency response actions were adequate to provide protective measures for the health and safety of the public. The licensee has held quarterly onsite drills in March, June and August 1987. The NRC inspection findings and the licensee's training drills provide assurance that the licensee has maintained a satisfactory capability to respond to an emergency at Pilgrim. In addition, the licensee has scheduled its annual onsite exercise for December 9, 1987 which will test the current level of onsite emergency preparedness at the Pilgrim station. The licensee states that this exercise will also include limited participation by the Commonwealth.

Since the last full participation biennial exercise at Pilgrim (in September 1985), the Commonwealth has participated on a limited basis with the licensee in the December 1986 exercise and the quarterly onsite drills in 1987. The March and June 1987 drills also included limited participation by several of the towns within the EPZ. The towns within the EPZ have also cooperated in the full scale siren test conducted by FEMA in September 1986. The Commonwealth has also participated in full participation exercises at the Yankee Nuclear Power Station in June 1986 and is scheduled to participate in a full participation exercise at the Vermont Yankee Nuclear Generating Station during the week of November 29, 1987.

IV.

The requested exemption is a temporary one and is necessary because ongoing emergency preparedness efforts will not be completed before early 1988. The licensee has made a good faith effort to comply with the regulation by assisting in the ongoing improvements to the Commonwealth and local offsite emergency response programs. The extensive efforts required to upgrade the offsite plans, implement the changes and conduct training preclude the conduct of a meaningful and effective full participation exercise in 1987. This situation constitutes the special circumstances described in 10 CFR 50.12(a)(2)(v). Further, the NRC staff believes that the public health and safety will be better served by the conduct of a full participation exercise following the completion of efforts to improve the Commonwealth and local government emergency response programs.

The Commission has thus determined that, pursuant to 10 CFR 50.12, the exemption requested by the licensee's letter dated September 17, 1987, as discussed above, is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security.

Accordingly, the Commission hereby approves the following exemption:

"The Pilgrim Nuclear Power Station is exempt from the requirements of 10 CFR 50, Appendix E, Section IV.F.3 for the conduct of an offsite full participation emergency preparedness exercise in calendar year 1987."

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this Exemption will have no significant impact on the environment ( FR ). This Exemption is effective upon issuance.

Dated at Bethesda, Maryland this            day of October 1987.

FOR THE NUCLEAR REGULATORY COMMISSION

Steven A. Varga, Director  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Reactor

Pilgrim - Activities Update - 10/28/87

On October 27, 1987 NRC filed a Motion to Dismiss State Senator Golden's Appeal of October 1, 1987. (Senator Golden's Appeal requested NRC to suspend Pilgrim's operating license until safety and emergency planning concerns are resolved). The NRC Motion, filed in the U.S. Court of Appeals, 1st Circuit, is based on grounds that the Court lacks jurisdiction on the NRC refusal to take enforcement action (i.e. The Director's Decision of August 21, 1987 in Response to Senator Golden's 2.206 Petition of July 15, 1987). OGC will also file within a few days a Motion to Dismiss the Commonwealth of Massachusetts' Motion for Leave to Intervene in Senator Golden's Appeal.

In response to the Town Selectmen's request, the NRC will attend a public meeting in Duxbury, MA on October 29, 1987 to respond to public questions regarding Pilgrim (Staff participants include W. Kane, S. Collins, T. Martin of Region I and B. Boger of NRR). Commonwealth and BECo representatives also plan to participate. Senator Golden, a representative of Congressman Studd's office and other local officials will also participate.

The NRC Restart Panel will meet at the Pilgrim site on October 29, 1987 to discuss coordination of staff activities regarding Pilgrim.

On October 26, 1987 Boston Edison signed the submittal of Part II of their Restart Plan, including Appendices. Copies are not yet available in Washington.

Staff work and OGC review continues on the BECo request of September 17, 1987 for a one time schedular exemption from the requirement to complete the biennial emergency preparedness exercise by December 31, 1987.

Staff work has commenced on the response to the October 15, 1987 10 CFR 2.206 Petition from the Massachusetts Governor and Attorney General. Petitioners request an order to show cause why the Pilgrim Nuclear Power Plant should not remain closed until a full adjudicatory hearing resolves the issues identified in the Petition.

*[This portion of record "not within scope of request"]*

NOVEMBER 1987 OVERVIEW REPORT  
PLANT NAME: PILGRIM  
PROJECT MANAGER: R. H. WESSMAN

MONTHLY OPERATIONAL OVERVIEW FOR NOVEMBER 1987

The plant continues to be down for an extended outage for refueling, resolution of equipment and operational difficulties, management issues and emergency planning concerns

Core reload completed 10/14/87.  
 Restart readiness expected early 1987.

Monthly Licensing Action Summary:

TRIPS THIS MONTH	0
TRIPS LAST 12 MONTHS	0
NUMBER OF REPORTABLE EVENTS	0

LICENSING ACTIONS

<u>TYPE</u>	<u>CATEGORY 1</u>	<u>CATEGORY 2</u>	<u>CATEGORY 3</u>	<u>TOTAL</u>
Licensing Actions Opened in 11/87 (Projected Categories)	0	1	0	3
Licensing Actions Closed in 11/87	0	0	0	4
Licensing Actions in Progress (Nov.30 1987)	0	0	0	42
Licensing Actions Returned (Cat 1) in 11/87	0			
For Applications received prior to 9/4/87				
Number under review by PM	0			
Number reviewed and completed by PM	0			

SIGNIFICANT ISSUES AND EVENTS

Significant Activities During November 1987

On November 9, 1987 Ralph Bird (Senior Vice President - Nuclear) issued a stop work order for maintenance and modification activities at Pilgrim. This was in response to his determination that the BECo standards of excellence were not being met by onsite personnel as indicated by several incidents occurring over the previous weekend. These incidents include (1) taped over lock on a high radiation area door on the refueling floor; (2) the removal of ductwork by maintenance personnel that would have led to a breach in a vital area barrier; (3) a small radioactive spill caused, in part, by the installation of a RHR valve (part of Safety Enhancement Program modification to provide cross-connect between RHR and fire water systems) without any packing; and (4) a missed RPS surveillance. None of these incidents appear to have resulted in an actual event with safety consequences nor does there appear to be any direct linkage between the incidents. BECo is evaluating the incidents and is gradually returning craft personnel to work.

Staff work and OGC review is complete on the BECo request of September 17, 1987 for a one time schedular exemption from the requirement to complete the biennial emergency preparedness exercise by December 31, 1987. The exemption should be issued in early December.

I/98

## Events

At 2:05 a.m. on 11/12/87, Pilgrim experienced a complete loss of offsite power. At the time of the event, the plant was shutdown, with the reactor refueled and reactor vessel reassembled, and power supplied through the startup transformer. Both Emergency Diesel Generators started automatically and picked up the safety related buses. The cause of the loss of offsite power appears to be associated with switchyard icing due to adverse weather conditions.

Power was not restored until about 11 p.m. November 12, 1987. NRC conducted an Augmented Inspection Team of the event on November 16-20, 1987, and a report is expected by mid-December. Initial conclusions indicate no major licensee shortcomings or significant generic implications.

### Significant Meetings Scheduled During December 1987 (NRR, Region, etc.)

The Pilgrim Restart Assessment Panel will meet at the site on December 8, 1987 to discuss staff coordination of technical reviews and inspections.

BECO will meet with the staff in Bethesda on December 10, 1987 to discuss their Emergency Operating Procedures upgrade program.

BECO plans to hold a "partial participation" Emergency Planning Exercise on December 9, 1987. Headquarters and Region I will observe.

### Items for Management Attention

Pilgrim readiness for restart remains uncertain. The Stop Work Action of November 9 and loss of offsite power event of November 12 have induced delays. Staff estimates RCS hydro will be conducted in mid-December and the ILRT will be conducted after January 1.

On November 16, 1987 Clay Warren assumed responsibility as Senior Resident Inspector. (Jeff Lynch and Tae Kim continue as residents).

NRR and BECO met on 11/24/87 to discuss a number of Fire Protection issues. One area of concern which was identified was the fact that no reviewer resources have been assigned on exemption requests 15, 18 and 22 (TAC No. 65962). All fire protection issues (4 out of 10 Restart TAC Numbers) have been designated as Restart Items because of BECO's performance in this area. NRC will determine whether these specific exemption requests should be considered Restart Items, and if so, will seek the assignment of higher review priority.

Status of Items Previously Identified for Management Attention

G. Requa, Project Engineer from PDII-I, continues to be loaned on a part-time basis to the Pilgrim Project team to assist with the licensing workload.

Owen Gormley returns to Nuclear Regulatory Research after serving for the month of November to assist on Pilgrim tasks.

Next Scheduled Refueling Outage

February 1989

cc: R. Messman  
PDI-3 R/F  
M. Rushbrook  
V. Rooney  
E. Adensam  
J. Wilson, Research

*[This portion of record "not within scope of request"]*

Pilgrim - Activities Update - 11/04/87

In response to the Town Selectmen's request, the NRC attended a public meeting in Duxbury, MA on October 29, 1987 to respond to public questions regarding Pilgrim. (Staff participants included S. Collins, R. Bellamy and J. Wiggins of Region I and B. Boger of NRR). Commonwealth and BECo representatives, State Senator Golden, Citizen Urging Responsible Energy (CURE), and other local officials also participated. The general tone of the meeting reflected opposition to plant restart until safety and emergency planning issues are resolved.

The NRC Restart Panel met at the Pilgrim site on October 29, 1987 to discuss coordination of staff activities regarding Pilgrim.

The staff has received the BECo Revision to Volume II of the Restart Plan. Initial staff review is in progress.

Staff work and OGC review continues on the BECo request of September 17, 1987 for a one time schedular exemption from the requirement to complete the biennial emergency preparedness exercise by December 31, 1987.

Staff work has commenced on the response to the October 15, 1987, 10 CFR 2.206 Petition from the Massachusetts Governor and Attorney General. Petitioners request an order to show cause why the Pilgrim Nuclear Power Plant should not remain closed until a full adjudicatory hearing resolves the issues identified in the Petition.

NRR issued 3 amendments to the Pilgrim license during the week ending October 30, 1987. They involved minor technical specification changes for undervoltage relays, HPCI/RCIC operability requirements and reactor pressure transmitter surveillance.

*[This portion of record "not within scope of request"]*

I/99

[This portion of record "not within scope of request"]

Pilgrim - Activities Update - 11/10/87

On November 9, 1987 Ralph Bird (Senior Vice President - Nuclear) issued a stop work order for maintenance and modification activities at Pilgrim. This was in response to his determination that the BECo standards of excellence were not being met by onsite personnel as indicated by several incidents occurring over the weekend. These incidents include (1) minor contamination of several individuals during chemical waste pump maintenance; (2) taped over lock on a high radiation area door on the refueling floor; (3) the removal of ductwork by maintenance personnel that would have led to a breach in a vital area barrier; (4) a small radioactive spill and personnel contamination caused, in part, by the installation of a RHR valve (part of Safety Enhancement Program modification to provide cross-connect between RHR and fire water systems) without any packing; (5) a missed RPS surveillance; and (6) several other minor area contamination incidents. None of these incidents appear to have resulted in an actual event with safety consequences nor does there appear to be any direct linkage between the incidents. BECo management has sent GE and Bechtel craft personnel home until Thursday. BECo is evaluating the incidents and developing an action plan to deal with these issues. The resident inspectors are following the licensee's actions.

On November 5, 1987 OGC filed a Motion to Dismiss the Commonwealth of Massachusetts as a party to the proceeding between Massachusetts Public Interest Research Group (MASSPIRG), et al and the NRC. This proceeding was instituted October 1, 1987, by State Senator William Golden's appeal in the U.S. Court of Appeals, 1st Circuit. Golden, MASSPIRG, et al are seeking judicial relief to the Director's Decision of August 21, 1987 regarding Pilgrim management, containment and emergency preparedness issues, and Massachusetts sought admittance before the Court on October 2, 1987.

Staff work and OGC review continues on the BECo request of September 17, 1987 for a one time scheduler exemption from the requirement to complete the biennial emergency preparedness exercise by December 31, 1987.

Staff work continues on the response to the October 15, 1987, 10 CFR 2.206 Petition from the Massachusetts Governor and Attorney General. Petitioners request an order to show cause why the Pilgrim Nuclear Power Plant should not remain closed until a full adjudicatory hearing resolves the issues identified in the Petition.

I/10/

RESTART STATUS  
11/13/87

<u>PLANT</u>	<u>SHUTDOWN</u>	<u>LICENSEE ACTION PLAN</u>	<u>RESTART ASSESSMENT REPORT</u>	<u>COMMISSION BRIEFING</u>	<u>RESTART DECISION</u>
Pilgrim	04/12/86	10/26/87C	01/29/88E	02/12/88E	02/26/88E

COMMENTS: RCS HYDRO IS EXPECTED IN LATE NOVEMBER AND ILRT IS EXPECTED IN EARLY DECEMBER. BECO IS STILL FORECASTING COMPLETION OF MOST OUTAGE ACTIVITIES BY DECEMBER. LOSS OF OFFSITE POWER EVENT (11/12/87) AND STOP WORK ACTION (11/09/87) MAY DELAY COMPLETION OF ONSITE ACTIVITIES.

INITIAL REVIEW OF BECO RESTART PLAN IS IN PROGRESS AND IS EXPECTED TO TAKE UNTIL MID-DECEMBER. INTEGRATED TEAM ASSESSMENT OF UTILITY READINESS IS PLANNED FOR EARLY JANUARY 1988.

RESOLUTION OF OFFSITE EMERGENCY PREPAREDNESS ISSUES EXPECTED TO BE A MAJOR ISSUE. COMPLETION OF IMPROVED LOCAL PLANS IS NOT EXPECTED BEFORE 12/31/87. SUBMITTAL DATE OF COMMONWEALTH EMERGENCY PREPAREDNESS PLANS TO FEMA IS UNKNOWN. BECO HAS REQUESTED AN EXEMPTION FROM THE BIENNIAL EP EXERCISE (REQUIRED BY 12/31/87) UNTIL EARLY 1988.

I/102

*[This portion of record "not within scope of request"]*

Pilgrim

11/18/87

At 2:10 a.m. on 11/12/87, Pilgrim experienced a complete loss of offsite power. At the time of the event, the plant was shut down, with the reactor refueled and reactor vessel reassembled, and power supplied through the startup transformer. Both Emergency Diesel Generators started automatically and picked up the safety related buses. The cause of the loss of offsite power appeared to be associated with switchyard icing due to an ongoing snow storm. Shutdown cooling was restored in approximately twenty minutes; however, it is not needed due to extremely low decay heat loads. Reactor coolant temperature dropped from 183°F to 90°F during the event. All safety systems appeared to have functioned as designed following the loss of power. The Commonwealth of Massachusetts Civil Defense agency was notified by NRC:RI at 5:25 a.m. The resident inspector responded to the site and Region I partially manned the Incident Response Center at 4:40 a.m.

At 11:48 a.m., operations personnel shut down the 'B' Emergency Diesel Generator due to a problem with the 'C' phase current transformer. This resulted in loss of the only operable air compressor and another shutdown cooling isolation. However, reactor coolant temperature remained stable due to the extremely low decay heat loads. By 3:00 p.m. weather conditions had improved and portions of the switchyard ring header had been re-energized from both incoming offsite power lines. At around 11:15 p.m. 11/12/87, offsite power was re-established to vital and non-vital buses via back-feeding through the main and auxiliary transformers. As of 7:00 a.m. 11/13/87, the A Emergency Diesel Generator (EDG) was still running supplying power to its associated vital bus and the B EDG was being prepared for testing. Thus far, the licensee has identified no equipment damage associated with the loss of power. The loss of power on 11/12/87 is still believed to have been associated with icing in the switchyard, however some anomalies associated with offsite power supply have been noted and may be associated with motion of ice laden lines in the wind.

A temporary air compressor has been moved onsite and is available to tie into the plant air system to provide a backup to the installed essential and nonessential plant systems as required.

I/103

In response to the Loss of Offsite Power event on November 12, 1987, the NRC has dispatched an Augmented Inspection Team to Pilgrim Station to commence an inspection on November 15, 1987. The Commonwealth of Massachusetts has been informed. The inspection will focus on the sequence of events and the licensee's response. Further, the Team will assess if a vulnerability exists in the Pilgrim Station design for loss of offsite power events. The team is expected to be onsite November 15-20, 1987. The team will also meet at Region I during the week of November 22-27. The full time participation of the NRR PM in these two weeks of activity will delay other ongoing actions such as the NRR Response to the Mass. 2.206 Petition and essential licensing actions.

[This portion of record "not within  
scope of request"]

Pilgrim

11/25/87

The Augmented Inspection Team is meeting this week at Region I to develop its report on its investigation of the recent loss of offsite power event. The Project Manager is continuing his full time participation in this activity.

NRR and BECo met on 11/24/87 to discuss a number of Fire Protection issues. One area of concern which was identified was the fact that no reviewer resources have been assigned on exemption requests 15, 18 and 22 (TAC No. 65962). All fire protection issues have been designated as Restart Items because of BECo's performance in this area. NRC will determine whether these specific exemption requests should be considered Restart Items, and if so, will seek the assignment of higher review priority.

I/104

Dick - please update and return to me by COB, Fri. 11/20.

Beth Ooolittle P-433

RESTART STATUS

~~11/16/87~~

11/30/87

<u>PLANT</u>	<u>SHUTDOWN</u>	<u>LICENSEE ACTION PLAN</u>	<u>RESTART ASSESS. INT REPORT</u>	<u>COMMISSION BRIEFING</u>	<u>RESTART DECISION</u>
PILGRIM	04/12/86 <sup>31, 1987</sup>	10/26/87C	01/29/88E	02/12/88E	02/26/88E

COMMENTS: RCS HYDRO IS EXPECTED IN ~~LATE~~ <sup>early</sup> NOVEMBER AND ILRT IS EXPECTED IN ~~EARLY~~ <sup>late</sup> DECEMBER. BECO IS STILL FORECASTING COMPLETION OF MOST OUTAGE ACTIVITIES BY DECEMBER. LOSS OF OFFSITE POWER EVENT (11/12/87) AND STOP WORK ACTION (11/09/87) MAY DELAY COMPLETION OF ONSITE ACTIVITIES.

INITIAL REVIEW OF BECO RESTART PLAN IS IN PROGRESS AND IS EXPECTED TO TAKE UNTIL MID-DECEMBER. INTEGRATED TEAM ASSESSMENT OF UTILITY READINESS IS PLANNED FOR EARLY JANUARY 1988.

RESOLUTION OF OFFSITE EMERGENCY PREPAREDNESS ISSUES EXPECTED TO BE A MAJOR ISSUE. COMPLETION OF IMPROVED LOCAL PLANS IS NOT EXPECTED BEFORE 12/31/87. SUBMITTAL DATE OF COMMONWEALTH EMERGENCY PREPAREDNESS PLANS TO FEMA IS UNKNOWN. BECO HAS REQUESTED AN EXEMPTION FROM THE BIENNIAL EP EXERCISE (REQUIRED BY 12/31/87) UNTIL EARLY 1988.

AIT has completed onsite review of LDDP event and a report is in preparation.

I/105

DECEMBER 1987 OVERVIEW REPORT  
PLANT NAME: PILGRIM  
PROJECT MANAGER: R. H. WESSMAN

MONTHLY OPERATIONAL OVERVIEW FOR DECEMBER 1987

The plant continues to be down for an extended outage for refueling, resolution of equipment and operational difficulties, management issues and emergency planning concerns

RCS Hydro Completed 12/10/87  
ILTR Completed 12/24/87  
Restart readiness expected early 1988.

Monthly Licensing Action Summary:

TRIPS THIS MONTH	0
TRIPS LAST 12 MONTHS	0
NUMBER OF REPORTABLE EVENTS	0

LICENSING ACTIONS

<u>TYPE</u>	<u>CATEGORY 1</u>	<u>CATEGORY 2</u>	<u>CATEGORY 3</u>	<u>TOTAL</u>
Licensing Actions Opened in 12/87 (Projected Categories)	0	0	0	0
Licensing Actions Closed in 12/87	0	0	0	2
Licensing Actions in Progress (Dec. 31 1987)	0	0	0	40
Licensing Actions Returned (Cat 1) in 12/87	0			
For Applications received prior to 9/4/87				
Number under review by PM	0			
Number reviewed and completed by PM	1			

SIGNIFICANT ISSUES AND EVENTS

Significant Activities During December 1987

In a letter dated December 18, 1987, Senator Kennedy requested NRC to participate in a Senate Labor and Human Resources Committee hearing in Plymouth on the evening of January 7, 1988, concerning the proposed restart of Pilgrim. Dr. Murley and W. Russell will testify for NRC. An NRC staff meeting with Kennedy staffers was held on December 30, 1987.

On December 9, 1987 NRR granted an exemption to the biennial emergency preparedness exercise, required to be conducted by 12/31/87. Exemption is granted until June 30, 1988, and is based on the need to complete development of improved Commonwealth and local plans prior to conducting a meaningful exercise.

BECO conducted a "partial participation" Emergency Preparedness Exercise on December 9, 1987. Although NRC observers noted some minor weaknesses, overall performance indicated that the licensee would have performed in a manner to protect the health and safety of the public, in the event of an actual accident. There was no local participation in the exercise and only limited Commonwealth participation (telephone checks). FEMA did not observe the exercise.

I/106

On December 14, 1987, BECo announced several key management changes at Pilgrim. The Security Section Manager and the Operations Section Manager are replaced, a Deputy Plant Manager has been hired (R. J. Barrett, from Oyster Creek), and the position of Station Director has been created (filled by new-hire K. L. Highfill, with consulting, San Diego Gas & Electric and nuclear navy experience).

### Events

None

### Significant Meetings Scheduled During December 1987 (NRR, Region, etc.)

The Pilgrim Restart Assessment Panel will meet at the site on January 8, 1988 to discuss staff coordination of technical reviews and inspections.

NRR Staff will meet with BECo on January 14, 1988 to discuss the pump and valve inservice testing program.

### Items for Management Attention

Unanticipated demands on Projects staff (loss-of-offsite power event, Kennedy hearings) coupled with loss of O. Gormley as Project Engineer have impacted completion of Pilgrim licensing actions. 11 TACs require completion prior to Restart.

On December 10, BECo met with the staff to discuss their Emergency Operating Procedures (EOP) program. BECo has provided the staff with their current Procedures Generation Program (PGP) which is written to revision 4 of the (industry-proposed) Emergency Procedures Guidelines (EPGs). (Staff review of these EPGs is not expected to be complete until Spring 1988; however the staff endorses utility use of the unapproved EPGs in their current form). Flow-chart oriented EOPs were placed in the Control Room in November and operator training is being conducted. The staff plans to review the Pilgrim PGP, assess the EOPs, conduct a site visit, and prepare a SER prior to a restart decision. Headquarters, Region I, and contractor personnel will conduct the review.

Status of Items Previously Identified for Management Attention

G. Requa, Project Engineer from PDII-I, continues to be loaned on a part-time basis to the Pilgrim Project team to assist with the licensing workload.

Dan MacDonald is designated as the new Pilgrim PM. He will assume responsibilities for Pilgrim on January 18, 1988.

Next Scheduled Refueling Outage

February 1989

cc: R. Wessman  
PDI-3 R/F  
M. Rushbrook  
V. Rooney  
E. Adensam  
D. MacDonald  
H. Berkow

*[This portion of record "not within  
scope of request"]*

Pilgrim - Activities Update - 12/2/87

Pilgrim readiness for restart remains uncertain. The Stop Work Action of November 9 and loss of offsite power event of November 12 have induced delays. Staff estimates RCS hydro will be conducted in mid-December and the ILRT will be conducted after January 1.

The Augmented Inspection Team report of the November 12, 1987 loss of offsite power event is essentially complete and should be issued next week. Initial conclusions indicate no major licensee shortcomings or significant generic implications.

As part of their efforts to resolve offsite emergency preparedness issues, BECo has been offering funding and personnel to local communities. Voters in a Duxbury Special Town Meeting on November 24, 1987, have rejected the BECo offer. Based on local press reports, this action casts doubt on how emergency preparedness improvements in this locality will be addressed and indicates a general sentiment opposing Pilgrim restart. Other local communities have accepted the BECo funding and assistance.

*I/107*

BECO plans to hold a "partial participation" Emergency Planning Exercise on December 9, 1987.

On November 30, 1987 BECO announced that they were reducing contractor work force by about 50%, to about 900 personnel. This is a move to reduce costs and an indication that outage activities are nearing completion.

About 60% of the site work that was interrupted under a Stop Work Order November 9, 1987 has been resumed. Work resumed includes fire protection modifications, physical security enhancements, the third diesel generator and decontamination activities. BECO is still evaluating the causes for the various poor practices and events leading to the Stop Work Order.

Staff work and OGC review is complete on the BECO request of September 17, 1987 for a one time schedular exemption from the requirement to complete the biennial emergency preparedness exercise by December 31, 1987. The exemption should be issued in about 1 week.

The Pilgrim Restart Panel will meet at the site on December 8, 1987. The Regional Administrator plans to attend.

NRR issued two Technical Specification amendments on November 30, 1987. One involved a change to a LPCI surveillance specification and the other involved a clarification to Control Rod Block and APRM instrumentation requirements.