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SUPERINTENDENT
NUCLEAR OPERATIONS DEPARTMENT

BECo. Ltr. #79-213

October 30, 1979

Mr. Thomas J. McKenna
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland 20014

License No. DPR-35
Docket No. 50-293

Pilgrim Nuclear Power Station Unit I
Emergency Plan

Gentlemen:

On September 25-27, 1979, an NRC Task Force conducted a review of the Pilgrim Station Emergency Plan and elements of state and local response plans. This review was conducted in part at Pilgrim Station and in public meetings in Plymouth, Massachusetts. Participants in the public meeting included representatives of the Boston Edison Company, Massachusetts Civil Defense Agency and other state and local agencies. During the course of this review, it was clearly pointed out that the present approved PNPS Emergency Plan meets all the current Federal and State requirements and has been adequately tested by annual drills. At the conclusion of the meetings, Boston Edison Company was requested to submit a revised emergency plan to reflect consideration of those issued identified by the NRC Task Force which require additional clarification, in light of the T.M.I. accident. This submittal is in response to that request.

Content of Submittal

The submittal is in two parts. The first part is a proposed revision to the Pilgrim Station Emergency Plan. This document has been revised to include consideration of those items raised by the NRC Task Force which are within Boston Edison's scope of responsibility. This revised plan has been reviewed and concurred in by the Pilgrim Station Operations Review Committee.

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The second part consists of information forwarded to Boston Edison Company by the Massachusetts Civil Defense Agency. This information package responds to issues raised by the NRC Task Force which are within the scope of responsibility of the State and local agencies. The Civil Defense Agency is currently preparing a revision to these portions of the Commonwealth's Comprehensive Emergency Response Plan dealing with nuclear power plant emergency response. Boston Edison Company understands that this revised plan will incorporate the concepts described in the enclosed information package and will submit this plan to the NRC's Office of State Programs for review and concurrence prior to January 1, 1980.

Items Requiring Further Evaluation

Several topics raised by the NRC Task Force will require additional evaluation prior to implementation. In general, these items need to be studied further due to the absence of criteria for design or implementation. It is anticipated that such criteria will be developed either by NRC or by Boston Edison Company for these items. The major items in this category include:

1. Plant Technical Support Center

   Until requirements for this center are defined and the criteria implemented, the plan contemplates the use of an interim technical support center.

2. Plant Operational Support Center

   Similarly, an interim operational support center has been identified.

3. Emergency Operations Center

   Locations for this facility are under evaluation.

4. Press Center

   A location for this facility has been identified and the use of the area is being discussed with Plymouth Officials.

5. Emergency Action Levels

   Boston Edison Company agrees with the concept of emergency action levels based on control room indications. The attached plan acknowledges this point. Details on which instruments and readings would serve to classify various events are being evaluated at this time. These action levels will be defined in plant procedures. As requested at a meeting with the NRC Task Force #4, at Bethesda, Maryland, on Monday, October 29, 1979, the Emergency Action Levels (E.A.L.'s) will be included in the Emergency Plan. These E.A.L.'s

will be submitted as a supplement to this submittal on or before November 21, 1979.

6. Standard Message Formats

Boston Edison Company and the affected state and local agencies will establish standard message formats.

7. NUREG-0578 Items Implementation

In a letter dated October 19, 1979, to Mr. Darrell G. Eisenhut, Acting Director, Division of Operating Reactors, Boston Edison Company responded to the items contained in NUREG-0578, as modified by Division of Operating Reactors Letter dated 9/13/79, Follow-up Actions Resulting from the NRC Staff Reviews Regarding Three Mile Island Unit 2 Accident. Several of these items will have an impact on the Pilgrim Station Emergency Plan. Boston Edison Company will revise the Emergency Plan on the same schedule that the NUREG-0578 items are implemented. This implementation schedule is identified in the October 19, 1979, letter from Boston Edison Company to Mr. Darrell G. Eisenhut, Acting Director, Division of Operating Reactors, U.S. NRC.

Implementation of Revised Plan

Boston Edison Company will implement the attached emergency plan within a suitable time to allow for procedure preparation and personnel training following receipt of NRC concurrence with the revised plan. Boston Edison Company will implement the plan within 60 days of receipt of NRC concurrence with the enclosed draft plan or within 60 days of startup following the January refueling outage, whichever occurs later.

We would be pleased to meet with you to discuss the revised plan if such a meeting would assist you in your review.

Very truly yours,

G. Carl Andognini

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