

BOSTON EDISON COMPANY  
GENERAL OFFICES 800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

A. V. MORISI  
MANAGER  
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

May 11, 1981

BECO. Ltr. #81-93

Mr. Boyce Grier, Director  
Office of Inspection and Enforcement  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA. 19406

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

Supplemental Response to IE Inspection No. 80-05

Ref. (A) Response to IE Inspection No. 80-05 - BECo. Ltr.  
No. 80-202 dated August 29, 1980

(B) Special NRC Health Physics Appraisal, IE Inspection  
Report No. 80-05 dated July 22, 1980

Dear Sir:

In Reference (A) Boston Edison Company responded to IE Inspection Report No. 80-05. Within that response BECo provided its plans for implementation of corrective actions and the schedules for completion of the actions for each of the items identified in Appendix A to Reference (B) as Significant Appraisal Findings. The purpose of this letter is to notify you that the completion dates, provided in Reference (A), could not be met for two items: Internal Dosimetry Program and Respiratory Protection Program. Attachment (A) to this letter contains a description of each item, the original commitment, the detailed reasons for the delay in program completion, the current status of each program and the newly projected completion dates.

Boston Edison Company is committed to achieving and maintaining a strong, effective health physics program and the concerted effort being expended to produce totally integrated, state of the art Internal Dosimetry and Respiratory Protection programs, documents that commitment.

We trust that the information supplied in Attachment A to this letter substantiates the extensions necessary to complete implementation of the programs. However, should you have any comments or questions concerning this matter, please do not hesitate to contact us.

Very truly yours,

*A. V. Morisi*

Attachment (A) to BECo. Letter No. 81-93

The following format is used for each of the items addressed in the cover letter:

- (a) The Significant Appraisal Finding as identified in IE Inspection Report No. 80-05, Reference (3)
- (b) Boston Edison Company response to that finding as provided in Reference (A)
- (c) The supplemental response to that finding including reasons for completion delay, current status of each item and the newly projected completion date.

SIGNIFICANT APPRAISAL FINDING - Reference (B)

A. Internal Exposure Control Program

The overall program for internal exposure control was found to be inadequate and not effective due to:

- 2. lack of procedures to provide for proper collection, handling and analysis of indirect bioassay samples; together with a lack of procedures establishing biological models and calculational techniques necessary to evaluate monitoring data in terms of dose assessment and compliance with intake limitations set forth in 10 CFR 20.103.

Response A-2. - As Provided in Reference (A)

In the month of June, four Health Physics Engineers attended a one week course on Internal Dosimetry at the University of Lowell, Lowell, MA.

At the present time, indirect bioassay sampling and interpretation of results is under evaluation. Consultants are in the process of being contacted to assist Boston Edison in developing a comprehensive Internal Dosimetry Program.

Supplemental Response to A-2.

Following the completion of the Internal Dosimetry training course by members of its staff, Pilgrim Station's Health Physics Group initiated a reevaluation of its planned internal dosimetry program developments. Considered during this reevaluation were the pending International Committee on Radiation Protection (ICRP) recommendations which had been issued in draft format during 1980.

It became obvious during the reevaluation process that the scope of the internal dosimetry program development was much larger than originally conceived and its nature more complex than initially anticipated. In the late fall of 1980, a decision was made to expand the scope of the program to encompass the proposed ICRP recommendations as much as possible.

To achieve this goal, an eminent figure in the Health Physics Consulting area was contracted to develop the internal dosimetry

program for Pilgrim Station which would incorporate those aspects of the ICRP draft recommendations deemed applicable.

Due to the complexities involved in this newly scoped program development the projected completion date for this effort is January 1, 1982.

(SIGNIFICANT APPRAISAL FINDING)

- A. 3. failure to ensure consideration of engineering controls for airborne radioactivity areas or to evaluate and document the practicability of applying process or engineering controls in airborne radioactivity areas. Excessively high loose radioactive contamination levels existed in many areas of the plant and a program to reduce and maintain significantly lower levels was not implemented.

Response to A-3. As Provided in Reference (A)

The consideration of engineering or process controls and the practicality of their use in airborne radioactivity areas is currently being implemented through the ALARA Program Procedures. In addition, these procedures address the initial decontamination of areas containing high levels of radioactive contamination as well as making reasonable efforts to maintain low contamination levels.

The Respiratory Protection Program and accompanying procedures, which are in the process of being written, will incorporate the consideration and use of engineering and process controls in airborne radioactivity areas on an expanded scale to meet the guidelines of NUREG-0041.

Full implementation of the ALARA procedures was achieved on August 4, 1980, and full implementation of the Respiratory Protection Program and accompanying procedures will not be achieved until March 1, 1981, depending upon the procurement of necessary equipment and facilities. Several facilities are being evaluated at this time, which could result in implementation of the Respiratory Protection Program and accompanying procedures as early as January 1, 1981.

Supplemental Response to A-3.

Delays have been experienced in equipment procurement and delivery, facility modifications and recruitment of experienced personnel each of which is an essential component utilized in development of the Respiratory Protection Program.

Modifications to the station air system are necessary to facilitate a fresh air supply network. The nature and scope of these design changes have been determined and equipment ordered. Installation is dependent upon receipt of the equipment.

A drycleaning system for cleaning respirators, health physics test equipment and new respirators/face masks have been purchased and are on site awaiting completion of the modifications to the dedicated facility.

At this juncture the Respiratory Program is approximately 80% complete. The procedures, which are an adjunct of the program, are approximately 50% complete. Completion of the total program is contingent upon completion of the essential components and the major contributor to the delay, the facility modifications, is now scheduled for completion during August, 1981. A draft of the program and its implementing procedures will be available at that time. Implementation of the final Respiratory Program will be achieved by September 1, 1981.