

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

A. V. MORISI  
MANAGER  
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

June 8, 1982  
BECO. Ltr. #82-168

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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

Response to NRC Generic Letter  
No. 82-10  
Post TMI Requirements

Dear Sir:

The subject letter requested Boston Edison Company to establish firm schedules or reconfirm previously submitted schedules concerning implementation of the NUREG 0737 items identified in your letter as Enclosure. For those items already completed, no further information other than the date of completion was requested. Conversely, proposed dates for completion of remaining items were requested along with the following information:

- a) justification for proposed schedule,
- b) demonstration of need for proposed schedule and
- c) description of compensatory measures to be taken in the interim.

Attachment B outlines our response to the Subject NUREG items. It must be noted that Boston Edison has previously responded on these items. Those responses are incorporated, by reference, in this letter as outlined in Attachment A.

Should you require additional information, beyond that provided in Attachment B to this letter, please contact us.

Very truly yours,

*A. V. Morisi*

Commonwealth of Massachusetts)  
County of Suffolk )

Then personally appeared before me A. Victor Morisi, who, being duly sworn, did state that he is Manager - Nuclear Operations Support of Boston Edison Company, the applicant herein, and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My Commission expires: *October 21, 1988*

*Peter M. Fidler*  
Notary Public

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Attachments A&B

A046

ATTACHMENT A

REFERENCES

- (A) BECo letter 80-318 dated December 31, 1980
- (B) NRC Ltr. From D. B. Vassallo Dated March 31, 1982
- (C) BECo. Ltr. 82-56 to NRC Dated Feb. 15, 1982
- (D) NRC LTR. Dated Jan. 7, 1982 to A. V. Morisi
- (E) BECo. Ltr. 81-200 Dated Aug. 24, 1981
- (F) BECo. Ltr. '80-57 Dated April, 7, 1980
- (G) NRC Ltr. Dated May 12, 1980 to G. C. Angdoghini
- (H) BECo. Ltr. 81-99 Dated Aug. 20, 1981
- (I) BECo. Ltr. 81-92 Dated May 8, 1982
- (J) BECo. Ltr. 82-158 Dated June 3, 1982
- (K) BECo. Ltr. 81-121 Dated June 1, 1981
- (L) BECo. Ltr. 81-37 Dated Feb. 11, 1981

## ATTACHMENT B

### Item I.A.1.3(1)

#### Limit Overtime

Ref. A provided clarification to BECo's position regarding overtime restrictions at PNPS. Ref. B acknowledged your staff's review and acceptance of BECo's position, however, this was based on a review of quoted correspondence prior to the Reference A clarification. Assuming this is merely an administrative oversight on the part of your staff, we consider this item complete and plan no further action at this time.

In addition, please be advised that PNPS Procedure 1.3.17, which contained PNPS's overtime policy, was retired with the intention of incorporating PNPS's overtime policy into PNPS Procedure 1.3.34, however, the PNPS overtime policy was inadvertently omitted from Procedure 1.3.34. Procedure 1.3.34 is being revised to reflect the overtime requirements of Procedure 1.3.17 and although the overtime policy is not currently procedurally addressed, the policy has remained in effect since its inception.

### Item I.A.1.3(2)

#### Minimum Shift Crew

Ref. D requested Boston Edison to respond to our ability to meet the implementation schedule of July 1, 1982. Based on our Review of Ref. C, we identified the need for a 12 week relief on our commitment. It is now anticipated that Boston Edison will be able to meet the NRC Shift Manning Requirements by Sept. 17, 1982. Justification and compensatory measures have been outlined via Ref. C.

### Item I.C.1

#### Emergency Procedures

Ref. E provided Boston Edison's Commitment for implementation of the Revised Emergency Operating Procedures. We stated implementation will be met by the first refueling commencing after Jan 1, 1982. It is Boston Edison's intent to meet that commitment. It must be noted, however, our implementation is constrained by the guidance provided in NUREG 0737 which states:

"The NRC staff will review the analysis and guidelines and determine their acceptability by July 1, 1981, and will issue guidance to licensees on preparing emergency procedures from the guidelines. Following NRC approval of the guidelines, licensees and applicants for operating licenses issued prior to Jan. 1, 1982, should revise and implement their emergency procedures at the first refueling outage after Jan. 1, 1982."

Boston Edison endorses that staff's position for implementation and will not implement until NRC approval on the acceptability of the revised emergency procedure guidelines is provided. Dates for completion can not be determined until NRC staff approval is provided.

### II.E.4.2

#### Containment Isolation

Boston Edison inadvertently did not respond on this item in response to Generic Letter 82-05. We are now providing the following information.

#### II.E.4.2 (Continued)

##### Position 5

Ref. F provided our response and justification for the set point change. Ref. G provided the staff's concurrence with this position. This item has been complete since May 15, 1980 and no further action is planned.

##### Position 7

Ref. H provided our position on this item, and no further action is planned at this time.

#### Item II.K.3.18

##### ADS Actuation

Ref. I provided our response on this item. Accordingly, we believe this satisfies the Subject NUREG item. Additionally, Boston Edison is participating with the BWR Owner's Group which is re-evaluating their position on this item.

#### II.K.3.30 and II.K.3.31

##### SBLORA Models

Ref. J provided our response on this item. This item is complete, we plan no further action at this time until your review is complete.

#### Item III.A.1.2

##### Staffing Levels for Emergency Situations

Despite the fact that this is not a NUREG 0737 item, Reference K provided Boston Edison's response to this issue. The licensee is still awaiting an NRC response to the acceptability of our stated position.

##### Upgrade Emergency Support Facilities

Reference K provided Boston Edison's response to the subject NUREG item. Since the submission of that response the requirements for emergency response capabilities have undergone considerable review by the NRC, its staff, and its advisory bodies. The culmination of this review was the development of SECY 82-111 which recognizes the broad range of guidance documents that the NRC has issued in regards to this complex issue. SECY 82-111 also recognizes the need for coordination and integration of emergency preparedness and emergency response initiatives. Boston Edison concurs with the flexible yet integrated approach recommended in SECY 82-111 and awaits its approval by the NRC. Absent the approval of SECY 82-111 and a finalization of requirements for emergency response capabilities and facilities, Boston Edison submits that it is inappropriate at this time to provide a proposed completion date for upgrading our current capabilities. Upon approval of SECY 82-111 the licensee will provide a schedule for upgrading if necessary. In the interim the licensee has demonstrated that it maintains acceptable means for meeting this item.

#### Item III.A.2.2

##### Meteorological Data

As was described to you in Reference K, Boston Edison maintains a meteorological measurement program at PNPS-1 that includes two meteorological towers, associated instrumentation, data acquisition hardware and software. This program includes a 20 ft. guy-wired meteorological tower on which the following measurements are made:

### III.A.2.2 (Continued)

Wind speed	33 ft. and 220 ft. elevations
Wind direction	33 ft. and 220 ft. elevations
Temperature	33 ft. elevation
Delta Temperature	220 ft. - 33 ft. elevation

The program also includes a 160 ft. free-standing tower on which similar measurements are made. This tower serves as a backup to the 220 ft. tower.

Data processing equipment and backup calculation aids are provided in the Main Control Room and the Emergency Operation Facility that allow plant personnel to make rapid estimates of offsite dose rates and projected doses based on real time meteorology (15 minute averages) and information on the magnitude of releases of radioactive material from the plant as provided by effluent radiation monitors. This system uses a Class A atmospheric dispersion model (straight-line Caussian dispersion) which includes terrain and building wake effects.

The ability to access the system from remote locations is provided so that offsite personnel can determine average atmospheric dispersion parameters, atmospheric dispersion estimates and estimated dose rates and doses.

The primary data processing system is capable of providing offsite dose estimates within 1 minute after input of effluent flow rates and radiation monitor readings.

Two backup data processing methods are provided which are capable of using data from either the primary or secondary meteorological towers thereby providing high reliability.

The installation described above has been employed and evaluated during the PNPS emergency plan appraisal conducted from 7/13/81 to 7/21/81 and during the Joint Emergency Plan Exercise conducted on 3/3/82.

It is the position of Boston Edison that the installed systems provide adequate emergency response capability to ensure the protection of the health and safety of the public in the event of an emergency situation at the Pilgrim Station. BECo intends to defer additions to our present capability until the criteria recommended in SECY 82-111 are established as the definitive criteria by which emergency response capabilities will be intergrated, implemented, and eventually assessed.

### III.D.3.4

#### Control Room Habitability

Ref. L provided the details of the study for the Subject NUREG item. We feel adequate response has been provided and plan no further action at this time.