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United States Senate

COMMITTEE ON
ENERGY AND NATURAL RESOURCES
WASHINGTON, D.C. 20510

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Room 2003F
JFK Federal Building
Government Center
Boston, MA 02203
March 9, 1983

Mr. Carlton Kammerer
Director
Office of Congressional Affairs
Nuclear Regulatory Commission
1717 H Street, NW
Washington, DC 20555

Dear Mr. Kammerer:

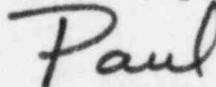
I am writing to you again at the request of the Pilgrim Alliance, residents of Duxbury and other area communities, regarding the safety of the Pilgrim I nuclear power plant.

A member of my staff was present at the public hearing held on November 16, 1982, by the Board of Selectmen of Plymouth to discuss the means by which Boston Edison was complying with the NRC order for modification of Pilgrim I. The enclosed self-explanatory letter I have received from the Alliance restates some of the problems which the local residents feel were not adequately addressed at that meeting, including the issue of several recent incidents involving notification problems and fire protection inadequacies.

As I publicly stated in January of last year, my first concern is for the safety of the residents of Massachusetts. Both the utility and the Nuclear Regulatory Commission owe to the citizenry a full explanation and the satisfactory resolution of all safety questions. Such cooperation is also essential to the future of the nuclear industry.

In fulfilling your purpose to assure the safe use of nuclear facilities and materials, I am certain that you will give the enclosed correspondence every appropriate consideration.

Sincerely,



PAUL E. TSONGAS
United States Senator

PET/ptt
Enclosure

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PDR ADOCK 05000293
U PDR



TT
P.O. Box 957, Plymouth, MA 02360

January 27, 1983

Senator Paul Tsongas
Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Tsongas:

On November 16, 1982, the Pilgrim Alliance attended a public hearing by the Board of Selectmen at the Plymouth Town Hall. Also in attendance were representatives of the Nuclear Regulatory Commission and Boston Edison company. The purpose of the hearing was to learn how Boston Edison was complying with the NRC order for modification of Boston Edison's operating license for Pilgrim I, as related to the \$550,000 fine for gross mismanagement and safety violations at Pilgrim I.

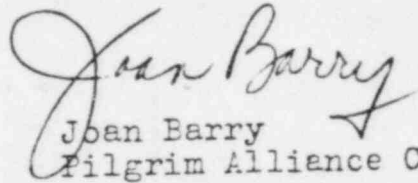
In preparation for the hearing, the Pilgrim Alliance carefully scrutinized the NRC's safety inspection reports of Boston Edison. After reviewing these reports, we were outraged that there were continuing problems unresolved and new violations had occurred. At this hearing, the Pilgrim Alliance was prepared to present a series of questions specifically pertaining to the NRC's safety reports. However, insufficient time was allowed to present these questions and the responses to questions presented were inadequate. We were told that the NRC would provide us with answers to these questions. As of this date, we have not received any response.

1. We remain concerned that the NRC is continuing to allow the plant to operate while correcting deficiencies.
2. New violations and deficiencies continue to occur. (Refer to enclosed material.)
3. There are still major problems with fire protection and plant operation.

We believe the NRC owes the people of Plymouth an immediate response to these issues. Furthermore, we demand

to know what specific steps Boston Edison is taking to rectify these problems and prevent their recurrence.

Sincerely,

A handwritten signature in cursive script that reads "Joan Barry". The signature is fluid and elegant, with a large initial "J" and a long, sweeping underline.

Joan Barry
Pilgrim Alliance Coordinator

Notification Problems

Based on Boston Edison Company's past performance, its poor management and safety practices, members of the Pilgrim Alliance have previously expressed concern that BECo may not properly notify the NRC and appropriate State agencies in the event of an unusual occurrence at Pilgrim I. In reviewing the NRC reports available to us, we found four incidents in recent months that dramatize the validity of ongoing concern over Edison's reliability in this area:

- 1) At an NRC Region I office management meeting on 6-5-82, it was stated by NRC staff that "During the recent Traversing Incore Probe incident of June 3, 1982, the NRC was not adequately kept informed of operations data by the communicator located at the Technical Support Center."
- 2) Prompt notification by telephone to the NRC within 24 hours, and written confirmation on the first working day was not received for the 6-1-82 incident involving re-circulation pump speed problems. This was classified as a Violation-Severity Level 4 (IV)
- 3) Prompt notification by telephone to the NRC within 24 hours & written confirmation on the first working day was not received for the 6-3-82 incident involving the failure of one of two alarm systems for a drywell suppression chamber system; this was also classified as Severity Level IV violation.
- 4) NRC operations center was not notified within an hour of an event occurring 9-1-82 which involved an actuation of the reactor protection system. This violation was classified as Severity Level 5.

Aside from these four violations, we found two other incidents which bring into question BECo's willingness to report problems at the nuclear station. One of these cases led to the NRC's criticism of the Company for failing to obtain NRC approval for changing the position of a torus dewatering valve. The NRC also criticized BECo for failing to conduct a proper safety evaluation of this procedure. This infraction was discovered in May of this year. (5-17-82)

What assurances do we have that these unreliable notification practices will not reoccur? When can we expect improvements in this area?

Walls

In late 1981, ten masonry walls were found to be structurally unsound and would not maintain structural stability during a seismic event, high energy pipe break, outside containment, or tornado depressurization. The failure of these walls would seriously impair the ability of the station to achieve safe shutdown by eliminating the redundancy of the core standby cooling system. These problems were due to design and construction error.

Have all of these walls been modified to insure structural stability?

If not, when will this take place?

What steps will be taken to

- 1) insure stability is achieved?
- 2) Why did it take 9 years to discover these unstable walls?
- 3) What action will take place to prevent recurrence?

Fixed Suppression System for Fire Protection Coverage for the Cable-Spreading Room

11-9-81 BeCo management declared the carbon dioxide gaseous fire extinguishing system for the cable-spreading room inoperable. A replacement system would not be in place until late 1982. BeCo stated to the NRC that it would initiate fire patrols, revise procedures to address interim fire fighting methodologies, and supplement training of key fire watch personnel.

We are concerned that such a vital fire suppression system continues to be lacking in an area vital to safe reactor operation. In reviewing safety inspection reports by NRC inspector J. Johnson from 5/10/82 through 9/6/82, numerous incidents have occurred at Pilgrim I indicative of poor fire protection procedures, including violations, deviations, and incidents inconsistent with NRC regulations.

The following incidents are classified as severity level V violations to NRC technical specification 6.8.D which requires written procedures for a fire protection program to be established, implemented, and maintained.

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- 1) 6-24-82 fire door #153 of the radwaste control building was blocked open without permission of the watch engineer or without establishment of fire patrol
- 2) 6-29-82 transient combustibles were moved into the radwaste and control building fan room without adequate controls. This room contains electrical cabling of safety systems A,B, and equipment for the control room efficiency air filtration system
- 3) 6-8-82 to 7-1-82 fire door #4 in the turbine building was unmonitored by access control

Other incidents include:

- 4) 5-19-82 security force personnel assigned to fire brigade inconsistent with NRC guidelines
- 5) 5-24-82 security watchman posted as fire watch in auxiliary boiler room exhibited questionable level of attention
- 6) 7-19-82 several safety-related fire doors were not locked, monitored by alarm, or inspected daily by the watch engineer
- 7) 8-18-82 a propane explosion occurred in a respirator test machine in the retube building
- 8) 8-29-82 two fire doors in auxiliary bay and turbine buildings closed inappropriately
- 9) 8-31-82 an operator assigned to fire watch intended to leave his area for another assignment without regard for his fire watch duty

Mussel Growth in Plant Cooling System

In a report to the U.S. Congress on abnormal occurrences at the nation's nuclear plants, the NRC cited a problem involving the accumulation of mussels or shellfish in the cooling system pipes at Pilgrim I. According to this report, issued in the fall of 1981, design errors and mussel buildup had made a heat exchanger inoperable at the plant, (August 28, 1981).

Can the NRC please explain the significance of mussel growth in the cooling system? Can this growth be controlled in the future? If chlorine is to be used to reduce the mussel concentrations, what will be the effect of increased chlorine use on marine life outside the intake or discharge canals at Pilgrim I? Shouldn't fishing in this canal area be restricted or banned until the effects of chlorine and other chemicals used to kill mussels are found to be safe?

We understand that a similar problem has occurred at the San Onofre nuclear reactor in California. What steps is the utility company taking there to reduce barnacle buildup??

Haywood Tyler Pumps

A major scandal has recently surfaced in the nuclear industry regarding the use of emergency core cooling system pumps produced by the Haywood Tyler Co. A House Subcommittee chaired by Rep. Ed Markey of Massachusetts has heard sworn testimony from former employees of the company who charged that their employer regularly cut corners and skirted federal regulations in manufacturing its products, and that the pumps could not be relied upon to perform in a real emergency.

Are there any Haywood Tyler pumps in use at Pilgrim I? If so, have they been tested recently to see if they're defective?

Spent Resin

On June 11, 1982, spent resin was found on the

- 1) roof of the turbine building
- 2) roof of the reactor building
- 3) roof of the off-gas building
- 4) roof of the re-tube building
- 5) and on the ground within the site controlled areas.

Analysis of the resin was identified as Cobalt 60 with a half life of 5 years, Cesium 137, with a half life of 30 years, Cesium 134, with a half life of 2.05 years and Manganese 54, with a half life of 303 days.

The licensee believes the resin was released from the reactor building ventilation exhaust system prior to the repair of defective filters in this system in September, 1981.

Question

Why did it take BECo 10 months to discover this spent resin consisting of long-lived radionuclides?

How do we know that additional ^{contamination} ~~containment~~ did not occur and what was found was only part of the release?

Was the town of Plymouth notified? We believe that local officials should have been notified due to the potential threat these radionuclides present to our environment, i.e. Cobalt 60 effects the ovaries and Cesium 137 effects the muscles and reproductive organs.

Why doesn't BECo regularly check on a frequent basis all onsite areas?