

BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

May 17, 1984
BECO 84-72

Mr. Richard C. DeYoung
Director, Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Subject: Response to Notice of Violation and Proposed Imposition of Civil Penalties
(NRC Inspection No. 50-293/84-03)

Dear Sir:

Boston Edison Company, holder of License DPR - 35, pursuant to 10 CFR 2.201 and 2.205, and otherwise according to law, hereby responds to the Notice of Violation and Proposed Imposition of Civil Penalties issued April 17, 1984. The response is set forth as Attachment A hereto.

In response to the Notice of Proposed Imposition of Civil Penalty transmitted herewith is our check in the amount of \$40,000 payable to the Treasurer of the United States.

Although Boston Edison Company has elected not to contest the proposed civil penalty and fully acknowledges the program deficiencies which led to the subject occurrence we would like nevertheless to emphasize that neither the individual most directly involved in the incident, nor any other potentially involved individuals,

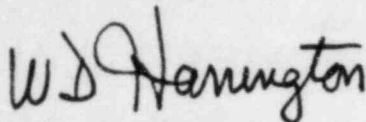
8405230217 840517
PDR ADOCK 05000293
Q PDR

IE 01
1/1

Mr. Richard C. DeYoung
Page Two
May 17, 1984

received an exposure to radiation in excess of regulatory limits. The full attention of senior management has been brought to the examination of the cause of the subject incident and to the corrective actions which have been undertaken. I assure you that Boston Edison Company is fully committed to the proper control of licensed activities occurring at Pilgrim Nuclear Power Station.

Very truly yours,



W.D. Harrington
Senior Vice-President, Nuclear

Commonwealth of Massachusetts
County of Suffolk

Then personally appeared before me, William D. Harrington, who, being duly sworn, did state that he is Senior Vice-President, Nuclear of Boston Edison Company 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:

4-14-89
DATE


NOTARY PUBLIC

/mfg

Registered Mail
Return Receipt Requested

cc: Regional Administrator
U.S. Nuclear Regulatory Commission
Region I - 631 Park Avenue
King of Prussia, PA 15406

ATTACHMENT A

Response to Notice of Violation and Proposed Imposition of Civil Penalty

Boston Edison Company
Pilgrim Nuclear Power Station

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

Pursuant to Sections 2.201 and 2.205 of the NRC's "Rules of Practice" Part 2, Title 10 of the Code of Federal Regulations, and otherwise according to law, Boston Edison Company (BECO) hereby provides its answer to the "Notice of Violation and Proposed Imposition of Civil Penalties" dated April 17, 1984, issued in the above captioned docket.

VIOLATION "A":

10 CFR 20.203 (f) requires that containers of licensed materials in quantities greater than the applicable quantities of Appendices B and C be attended or labeled with sufficient (radiological) information to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures.

Contrary to the above, on January 14 - 18, a container of licensed material with quantities greater than the applicable quantities of Appendices B and C located in the Control Rod Drive Repair Room, with radiation levels measured as high as 2880 R/hour, was not attended or labeled to alert individuals of the need to take precautions to avoid or minimize exposures.

Response to Violation A:

(1) Boston Edison Company admits the violation.

(2) Reasons for the Violation

As mentioned in the response to CAL 84-03, after conducting an evaluation of the Health Physics controls used for the work in the CRD Repair Room between January 14 and 18, 1984, we have determined that there was only one incident in which workers were not given adequate radiological briefings. That incident involved the entry of three individuals on the morning of January 18, 1984, who were not told about the bucket in question nor its associated dose rates. A lack of constant Health Physics coverage and a breakdown in communications was the reason for the violation.

(3) Corrective Actions Taken and the Results Achieved

On Thursday, January 19, 1984, the Chief Radiological Engineer performed the immediate implementation of constant health physics coverage for all entries into the CRD Repair Room. (This did not apply to entries to the "A" RHR Valve Room or the Steam Tunnel which requires an individual traverse a small section of the CRD Repair Room.) The Sr. Radiological Engineer then instructed the personnel directly responsible for providing health physics coverage on the CRD replacement job of the constant H.P. coverage requirement. In addition, an entry was made in the CRD Repair Room H.P. Log Book concerning the requirement. Subsequently, applicable Radiation Work Permits were revised to reflect the requirement.

Improved source controls and assurance that workers are aware of radiological hazards in the area were the results achieved, once the above actions were taken.

(4) Corrective Actions Taken to Prevent Recurrence

A memo was issued by the Chief Radiological Engineer to all Health Physics personnel stressing the requirement for complete shift turnovers and proper communications between Health Physics personnel. Subsequent to issuance of this memo, it was learned that some H.P. personnel had not read or understood the contents of the memo. As further corrective action, the Chief Radiological Engineer instituted a policy whereupon employees by their signature, will indicate that they have read and understood the contents of the material they have been given to review, in the case of memos related to issues determined significant by Health Physics management. This policy was retroactively enforced to include the aforementioned memo.

As further actions to preclude recurrence, the Training Department has included an additional segment in the training package for H.P. technicians which emphasizes the point made in the above-mentioned memo.

Additionally, procedure 6.1-022 "Radiation Work Permits" has been modified to provide more specific guidance in establishing positive controls for work conducted in high radiation areas. These controls include a provision that limits the authority of decreasing surveillance from constant to periodic to supervisory personnel.

We now have confidence that lessons learned from this event have been and will be effectively communicated to the appropriate personnel.

(5) Date When Full Compliance was Achieved

Full compliance with 10 CFR 20.203 (f) was achieved on January 19, 1984 by requiring constant H.P. coverage in the area of the CRD repair room.

VIOLATION "B":

10 CFR 20.202 requires licensees to provide and require the use of appropriate personnel monitoring equipment in circumstances where individuals may receive or are likely to receive a dose in excess of 25 percent of values specified in 10 CFR 20.101 (a).

Contrary to the above, on January 14 - 16, 1984, appropriate extremity dosimetry was not used by a health physics technician handling the contents of a container of radioactive material and its contents, although the individual was likely to receive a dose in excess of 25 percent of the value specified in 10 CFR 20.101 (a) for extremities.

Response to Violation B:

(1) Boston Edison Company admits the Violation.

(2) Reasons for the Violation:

As mentioned in response to Confirmatory Action Letter 84-03, dated February 15, 1984, the reason for the violation was that the individual in question failed to take known precautionary and monitoring steps which had been taken or prescribed many times previously.

In this type of case, the person is not lacking in training or experience but still, for inexplicable reasons, the person neglects or forgets the sense of judgment which has been developed and makes a serious error which could lead to bodily injury.

(3) Corrective Action Taken and the Results Achieved

The subject individual was counselled subsequent to the incident. He was later questioned as to the proper controls for removal of an unknown source from a container. His answer showed that he properly understood the radiological requirements which should be followed.

Additionally, on February 17, 1984, a memo was issued to all H.P. personnel providing tabulated data, rules of thumb to be used in the field, and a summary refresher on the behavior of radiation levels in the vicinity of very small radiation sources. The newly instituted policy discussed in A (4) was also retroactively enforced for this memo.

(4) Corrective Actions Taken to Prevent Recurrence

On April 17, 1984, procedure 6.3-060 regarding "Radiation Survey Techniques" was modified to include guidance in the areas of (1) determining the true contact dose rates in relation to observed readings, source size and source geometry, and (2) emphasizing that a survey means an evaluation of the radiation hazards under a specific set of conditions, not just a recording of dose rates.

(5) Date When Full Compliance Was Achieved

The incident in question involved an isolated case on January 18, 1984, in which a Health Physics technician made two incorrect decisions (that of not using long-handled tools to handle the chips and not wearing extremity dosimetry). Therefore, full compliance with 10 CFR 20.202 was achieved on January 18, 1984 after the technician had exited the area.

VIOLATION "C":

10 CFR 19.12 requires that individuals working on or frequenting any portion of a restricted area be kept informed of the storage and use of radioactive materials or radiation, instructed in precautions or procedures to minimize exposure and instructed in the health protection problems associated with such exposure.

Contrary to the above, on January 18, 1984, three individuals entered the CRD repair room (a portion of the restricted area) to perform work and were not informed of the presence of a container of radioactive material in their immediate work area which was producing dose rates as high as 20 R/hour and containing material with contact radiation levels as high as 2,880 R/hour.

Response to Violation C:

(1) Boston Edison Company admits the violation.

(2) Reasons for the Violation:

The reason for the violation is a lack of constant Health Physics coverage and a breakdown in communications.

(3) Corrective Actions Taken and the Results Achieved

The actions of the Chief Radiological Engineer on January 19, 1984, as described in the Corrective Actions taken in response to Violation A in this same report, were also taken to address the issue of Violation C. Constant Health Physics coverage was instituted as a requirement for work in the area of the CRD Repair Room.

(4) Corrective Actions Taken to Preclude Recurrence

Action taken to enhance procedural guidance in this area is that procedure 6.1-022 "Radiation Work Permits" has been modified to provide more specific guidance in establishing positive controls for work conducted in High Radiation areas.

(5) Date When Full Compliance Was Achieved

Full compliance with 10 CFR 19.12 was achieved on January 19, 1984, the date of imposition of constant Health Physics coverage requirement in the CRD Repair Room.