



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

AUG 03 1990

MEMORANDUM FOR: Chairman Carr

FROM: James M. Taylor
Executive Director for operations

SUBJECT: IG REPORT NO. 90N-02

This is in response to your request of July 26, 1990, for my recommendations for appropriate actions in response to the Inspector General (IG) Report No. 90N-02, with focus on any actions that may be necessary with respect to emergency planning for the Pilgrim site or with respect to the staff's general approach to reviewing emergency planning issues of this type at a licensed reactor.

The IG Report raised the potential implications that the staff may have deliberately or willfully misled the Commission regarding the status of emergency preparedness at Pilgrim. Consequently, on July 26 I sent a memorandum to the IG asking if the IG had uncovered any evidence of a deliberate intent by any staff member to present inaccurate or incomplete information to the Commission. The IG responded on August 1, indicating that there was not evidence sufficient to substantiate that any staff member intentionally provided inaccurate information to the Commission. A copy of his August 1 memorandum is enclosed.

With regard to emergency planning at the Pilgrim site, the steady improvements in offsite emergency planning and capability observed by the staff have been documented in periodic status reports to the Commission, the latest of which was dated June 28, 1990. The information for each town was individually reviewed and telephonically confirmed (in one instance we received written comments) by locally designated emergency preparedness officials, prior to submission of the status report to the Commission. In addition, there was a full scale emergency planning exercise on October 12, 1989, and a remedial exercise on May 25, 1990. The draft FEMA report, which has been issued for comment, indicates that the two deficiencies identified during the October 1989 exercise were adequately resolved during the remedial exercise and concludes that the Commonwealth and local organizations demonstrated excellent knowledge of their respective plans and procedures and adequately implemented them. Therefore, the NRC staff concludes that the status of emergency preparedness at Pilgrim continues to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency.

Nonetheless, as additional assurance, the staff will be developing another updated status report for submission to the Commission in late September. As input to the next status report, the staff intends to hold a public meeting with local emergency preparedness officials in the vicinity of Pilgrim to obtain their views regarding the current status of emergency preparedness.

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Chairman Carr

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Before addressing action with regard to the staff's general approach to reviewing emergency planning issues of this type at a licensed reactor, I should note that the 1988 situation at Pilgrim put the staff in a unique role with regard to off-site emergency planning. FEMA had issued a report in 1987 stating that the State and local emergency planning had deteriorated in six areas to an unsatisfactory level. FEMA informed NRC that it would not be able to update the findings made in its self-initiated review until the State submitted revised plans for review. The State, in turn, was interacting with local towns and municipalities in redrafting the plans that were to become part of the overall emergency plan for the Pilgrim region. During this period the NRC staff closely followed the progress of Boston Edison in implementing the corrective actions called for by the Confirmatory Action Letter (CAL) issued April 12, 1986, and supplements thereto. The staff also monitored the progress being made in off-site emergency planning to provide reasonable assurance that public health and safety could be protected if the Commission allowed Pilgrim to restart at the completion of the corrective actions required by the CAL. This required staff contact with State and local emergency planning officials who were not the NRC's normal contacts.

In retrospect and with the Inspector General's Report in hand, I am certain there are lessons learned in the conduct of the Pilgrim off-site emergency planning review that should be considered were we to encounter a similar situation in the future. Thus, I have requested the Director, NRR, to conduct a "lessons-learned" review, including input from appropriate managers not directly associated with the Pilgrim matter, and provide me with recommendations on how we should proceed in the event we encounter a similar situation in the future. I expect to be able to provide you with the results of the review by September 30, 1990.

Original Signed By:
James M. Taylor
James M. Taylor
Executive Director for Operations

Enclosure:

August 1, 1990, Memorandum from
David Williams to James Taylor

cc: Commissioner Rogers
Commissioner Curtiss
Commissioner Remick
SECY
OGC