

APPENDIX A

NOTICE OF VIOLATION

Niagara Mohawk Power Corporation

Docket No. 50-220

Based on the results of an NRC inspection conducted on September 26-29, 1978, it appears that certain of your activities were not conducted in full compliance with the conditions of your license as indicated below. Item A is an Infraction; Item B is a Deficiency.

- A. 10 CFR 50, Appendix B, Criterion II states in part: "The applicant shall establish . . . a quality assurance program This program shall be documented by written policies, procedures or instructions Activities affecting quality shall be accomplished under suitably controlled conditions. Controlled conditions include the use of . . . suitable environmental conditions for accomplishing the activity, such as adequate cleanliness"

The accepted Quality Assurance Program (Twelfth Supplement to FSAR) states in part: "1.8 Program Compliance with Regulatory Guides and ANSI Standards. Those Regulatory Guides . . . referenced in: the 'Orange Book' entitled, 'Guidance on Quality Assurance Requirements During the Operations Phase of Nuclear Power Plants,' dated October 26, 1973 . . . are committed to"

Regulatory Guide 1.39, which is referenced in the "Orange Book" states in part: "The requirements and guidelines for the control of work activities, conditions and environments at water cooled nuclear power plant sites which are included in ANSI Standard N45.2.3 - 1973, 'Housekeeping During the Construction Phase of Nuclear Power Plants,' are generally acceptable and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10 CFR 50, subject to the following: . . . (2) Although subdivision 1.1 of ANSI N45.2.3 - 1973 states that the requirements promulgated apply during the construction phase of a nuclear power plant, these requirements should also be considered applicable for housekeeping during the operations phase . . ." ANSI N45.2.3 - 1973, subsection 2.1 requires the establishment of cleanliness requirements for housekeeping activities on a graded zone basis, including restrictions for each zone type.

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Contrary to the above, the quality assurance program was not fully implemented as of September 29, 1978, in that the referenced cleanliness requirements for housekeeping were not established.

- B. Technical Specification 6.11 states in part: "Procedures for personnel radiation protection shall be . . . adhered to" Nine Mile Point Nuclear Station Radiation Protection Procedures, states in part II, Contamination Control: "III.A.5. Roping and Tagging. A yellow and magenta rope is used to delineate contaminated areas in the station. The rope is placed to form a barricade around the entire contaminated area.

The standard radiation contamination tag . . . is placed on the rope so that personnel can readily determine the conditions inside the roped-off area."

Contrary to the above, on September 29, 1978, the Reactor Building 340 foot level (Refueling Floor) and the Foundation Room outside of the north door of the cable spreading room were contaminated to levels of 5000 and 1000 dpm per 100 centimeters square, respectively, and a contamination tag was not placed on the entrance to these areas as required.

