

APPENDIX A

Notice of Violation

Niagara Mohawk Power Corporation
Nine Mile Point Unit 1 and 2

Docket Nos. 50-220/410
License Nos. DPR-63/NPF-69

During an NRC inspection conducted on October 6 - November 9, 1991, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 50 Part 2, Appendix C (1991), the violations are listed below:

- A. Nine Mile Point Unit 1 Technical Specification 6.8.1 requires that written procedures be established and implemented that meet or exceed the requirements and recommendations of Appendix A of Regulatory Guide 1.33, which includes surveillance test procedures for test activities on safety related equipment. Niagara Mohawk Power Corporation (NMPC) administrative procedure 2.0, Procedure Use and Control, Section 3.2, requires that surveillance testing be conducted with approved station procedures. Further, procedures shall provide sufficient administrative controls to ensure assessment of plant impact, equipment configuration control, and personnel and equipment protection during testing.

Contrary to the above, on September 24, 1991, the core spray system pressure control valves 81-54 and 81-57 were tested without a properly approved procedure, i.e., a procedure established as required by Technical Specification 6.8.1. Further, test gauges were installed on these valves and used in a procedure, which did not provide sufficient administrative controls to ensure assessment of plant impact, equipment configuration control, and personnel and equipment protection during the testing.

This is a Severity Level IV Violation (Supplement 1).

- B. Nine Mile Point Unit 2 Technical Specification 6.8.1 requires that written procedures be implemented covering activities described in Appendix A of Regulatory Guide 1.33, which includes radiation protection procedures for contamination control and personnel monitoring. NMPC administrative procedure 3.3.3, Radiation Worker Conduct, section 6.2.6 states in part that radiation workers shall follow radiological postings and step-off-pad requirements, which include a minimum two-minute whole body frisk at specified egress points.

Contrary to the above, on November 6, 1991, eight radiation workers, within a 30-minute period, did not adhere to the radiological posting and step-off-pad requirements in that they failed to perform the minimum two-minute whole body frisk required at the egress point from the Unit 2 auxiliary boiler room.

This is a Severity Level IV Violation (Supplement 1).

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Pursuant to the provisions of 10 CFR 2.201, Niagara Mohawk Power Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

