

APPENDIX A
NOTICE OF VIOLATION

Niagara Mohawk Power Corporation
Nine Mile Point, Unit 1

Docket No. 50-220
License No. DPR-63

As a result of the inspection conducted on May 19-24, 1986, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

1. 10 CFR 20.201 requires, in part, that each licensee make or cause to be made such surveys that are necessary and reasonable to comply with 10 CFR 20. 10 CFR 20.201 defines a survey as, among other items, an evaluation of the radiation hazards incident to the presence of radioactive materials and, when appropriate, includes a physical survey of materials and measurements of concentrations of radioactive material present. 10 CFR 20.103 requires among other items, that respiratory protection equipment be used as specified therein. 10 CFR 20.103 also requires the use of engineering controls to minimize airborne radioactivity concentrations.

Contrary to the above, at about 4:30 p.m. on March 28, 1986 necessary and reasonable surveys to ensure compliance with 10 CFR 20.103 were not made during lapping operations on #15 discharge bypass valve. As a result appropriate respiratory protection equipment was not selected and used consistent with 10 CFR 20.103 (c)(1) requirements. The two workers lapping the valve generated airborne radioactivity with a peak concentration of about 420 times the applicable concentration specified in 10 CFR 20 Appendix B exceeding the protection factor (50) of respirators used by the workers. In addition, appropriate engineering controls, as required by 10 CFR 20.103(b)(1), were not used.

This is a Severity Level IV violation. (Supplement IV)

2. 10 CFR 19.12 requires in part, that all individuals working in or frequenting any portion of a restricted area be instructed in precautions and procedures to minimize exposure and the purpose and function of protective devices employed.

Contrary to the above, on April 28, 1986, two workers, performing grinding and lapping operations in preparation for replacing reactor water clean-up suction valve 33-02 (highly radioactively contaminated), were provided inadequate instructions for the installation and use of a glove bag. As a result, air tools were used within the bag. Air exhausting into the bag caused the bag to lose its integrity thereby subjecting the workers to airborne radioactivity concentrations of about 800 times the applicable 10 CFR 20 concentration values. In addition, and as a result, one of the workers sustained a limited unplanned intake of airborne radioactive material.

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This is a Severity Level IV violation. (Supplement IV)

Pursuant to the provisions of 10 CFR 2.201, Niagara Mohawk Power Corporation 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.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is crucial for ensuring the integrity of the financial statements and for providing a clear audit trail. The text notes that without proper record-keeping, it would be difficult to identify any discrepancies or errors that may have occurred.

2. The second part of the document outlines the various methods used to collect and analyze data. It describes how different types of information are gathered, such as through interviews, surveys, and the review of documents. The analysis phase involves identifying patterns, trends, and potential areas of concern. The document stresses that a systematic approach is necessary to ensure that all relevant information is captured and evaluated.

3. The final part of the document provides a summary of the findings and conclusions. It highlights the key points identified during the investigation and discusses their implications. The text concludes by stating that the information gathered is essential for making informed decisions and for improving the overall efficiency and effectiveness of the organization's operations.