

APPENDIX A

NOTICE OF VIOLATION

Public Service Electric and Gas Company

Docket Nos. 50-272
50-311

Based on the results of an NRC inspection conducted on December 12-15, 1978, it appears that certain of your activities were not conducted in full compliance with NRC regulations and the conditions of your license as indicated below. Item A and B are Infractions. Item C is a Deficiency.

- A. 10 CFR 50.59, "Changes, tests and experiments," states in part, "The holder of a license authorizing operation of a production or utilization facility may... make changes in the facility as described in the safety analysis report... without prior Commission approval, unless the proposed change... involves a change in the technical specifications incorporated in the license or an unreviewed safety question... The licensee shall maintain records of changes in the facility... to the extent that such changes constitute changes in the facility as described in the safety analysis report... These records shall include a written safety evaluation which provides the basis for the determination that the change... does not involve an unreviewed safety question."

Contrary to this requirement, on about August 2, 1978, the Liquid Waste Disposal System (a system described in the Final Safety Analysis Report) was changed, in that Valve Nos. 1WL79 and 1WL84 were modified in order to provide hose connections to an ancillary system. The modification of Valve Nos. 1WL84 and 1WL79 changed the mode of operation as described by the Final Safety Analysis Report, but a safety evaluation providing the basis for the determination that the change did not involve an unreviewed safety question was not performed.

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- B. 10 CFR 20.103, "Exposure of individuals to concentrations of radioactive material in air in restricted areas," states in part, "No licensee shall possess, use, or transfer licensed material in such a manner as to permit any individual in a restricted area to inhale a quantity of radioactive material in any period of one calendar quarter greater than the quantity which would result from inhalation for 40 hours per week for 13 weeks at uniform concentrations of radioactive material in air specified in Appendix B, Table I, Column 1... For purposes of determining compliance with the requirements of this section the licensee shall use suitable measurements of concentrations of radioactive materials in air for detecting and evaluating airborne radioactivity in restricted areas."

Contrary to this requirement, on December 14, 1978, a compactor operator working in accordance with Extended Radiation Exposure Permit 2E25, was subject to exposure to radioactive material in air without suitable measurements of the concentrations of radioactive material in air having been performed to detect and evaluate the airborne radioactivity in the restricted area.

- C. Technical Specification 6.8, "Procedures," states in Section 6.8.1, "Written procedures shall be established, implemented, and maintained covering the activities referenced... [in] the applicable procedures recommended in Appendix 'A' of Regulatory Guide 1.33, November, 1972." Regulatory Guide 1.33, November 1972, Appendix 'A', Section G.2.b. lists, "Baling Machine Operation." Maintenance Procedure M1A, "Solid Waste Compactor Operation," written in accordance to this requirement specifies that a radiation monitor (PIC-6) shall be installed, calibrated, and operating on the compactor while compacting operations are in progress.

Contrary to this requirement, on December 14, 1978, while compactor operations were in progress, a PIC-6 radiation monitoring instrument (or any other type of radiation monitoring instrument) was not installed on the compactor, nor was there such radiation monitoring instrument in the immediate area.