

APPENDIX A

NOTICE OF VIOLATION

Boston Edison Company M/C Nuclear
Pilgrim Unit 1

Docket No. 50-293
License No. DPR-35

As a result of the inspection conducted on January 5-9, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. Section 1.0 U of the Technical Specifications states in part that, "Unless otherwise stated in these specifications, periodic surveillance tests, ... shall be performed within the specified surveillance intervals."

Contrary to the above, the surveillances required by Technical Specifications 4.12.C.1 and 4.12.C.2 were not performed within the specified time interval for the charcoal filter bed fire protection spray system in the Standby Gas Treatment System.

This is a Severity Level V Violation (Supplement I.E).

- B. 10 CFR 50, Appendix B, Criterion V states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, ... and shall be accomplished in accordance with these instructions, procedures, ...". Administrative Procedure 1.3.4, Section III.A states in part, "Approved written procedures shall be adhered to by all station personnel." Administrative Procedure 1.5.3, "Maintenance Requests," specifies that the completed Maintenance Request (MR) shall identify the persons performing the Maintenance and post-maintenance testing; shall include a Description/Procedure No. of the post-maintenance testing; and identify the supervisory personnel who reviewed the completed MR packages.

Contrary to the above, the following MR packages had not been completed in accordance with these procedures in that:

- MR 80-1566 and MR 80-1572; Description of post-maintenance testing and persons performing the tests were not identified.
- MR 80-787 and MR 80-1587; Persons performing post-maintenance testing were not identified.
- MR 80-5685; Post-modification testing was completed and the person performing the test was identified, but the description and nature of the testing was not described.

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- MR 80-1599 and MR 80-606; Persons performing the maintenance were not identified.
- MR 8-210, Post-maintenance leak test had not been conducted.

This is a Severity Level V Violation (Supplement I.E).

- C. Administrative Procedure 1.3.4, "Procedures", paragraph III.D.3(b) states in part "...All Category One and Two procedures shall be revised or reviewed..., no less frequently than every two years...".

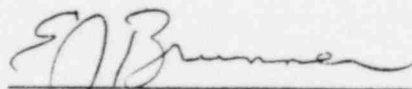
Contrary to the above, the following procedures had not been reviewed within two years:

- 3.M.1-10.2, Linear Measurement Equipment Calibration, Revision 0, September 29, 1977.
- 3.M.4-19, Maintenance Record System, Revision 1, August 17, 1978.
- 8.M.3-4, Reactor Building Vacuum Breaker Differential Pressure Sensor Calibration/Test, Revision 4, October 11, 1978.
- OP 2.4.1, Stuck or Inoperable Control Rod Drive, Revision 3, March 20, 1978.
- QA 2.01, Indoctrination and Training Programs, Revision 3, November 24, 1977.

This is a Severity Level VI Violation (Supplement I.F).

Pursuant to the provisions of 10 CFR 2.201, Boston Edison Company M/C Nuclear is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violation; (2) the corrective steps which have been taken and the results achieved; (3) corrective steps which will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated 19 FEB 1981


Eldon J. Brunner, Chief
Reactor Operations and Nuclear
Support Branch