

APPENDIX A  
NOTICE OF VIOLATION

Boston Edison Company  
Pilgrim Nuclear Power Station

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

As a result of the inspection conducted on April 1-30, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified.

- A. Technical Specification 6.8.A requires that "procedures be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1, 5.3 of ANSI N18.7-1972 ...". Section 5.1.5 of ANSI N18.7-1972 requires the use of procedures for equipment control and tagging.

Station Procedure No. 1.4.5 "PNPS Tagging Procedure", Revision 8, Section III.B, requires that protective tags be attached securely to controls ..., that if the tag could become illegible it should be inserted in a transparent holder, and that red tags placed on equipment without an accompanying maintenance request must be logged in the Red Tag Log.

Contrary to the above, between April 16, 1981 and April 27, 1981, the following conditions existed:

- Two red tags attached to the CARDOX tank fill valves in the turbine building were not logged in the Red Tag Log.
- A red tag attached to the outlet valve in the nitrogen supply line to the TIP room downstream of meter FQ5028 in the reactor building was not logged in the Red Tag Log.
- Two tags attached to the Auxiliary Heating Boilers were illegible and covered with paint; and one was attached to the light bulb and not the appropriate control switch.
- A red tag attached to a service air outlet connection isolation valve in the west end of the Radwaste Corridor was not logged in the Red Tag Log and had not been properly authorized.
- Two red tags attached to fittings (for a 3/8 inch air hose connecting the non essential instrument air to the service air for the flat bed filter seals) in the Radwaste Corridor were not logged in the Red Tag Log.

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

- B. Technical Specification 6.8.A requires that "procedures be established, implemented, and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972". Sections 5.3.3 and 5.3.4.1 of ANSI 18.7-1972 require the use of procedures for system operation and plant startup including the confirmation of valve and instrument lineups.

Station Procedure No. 2.1.11 "Current Valve Lineup File", Revision 0, Section IV, requires that a complete new valve lineup be made following each extended shutdown, and that these lineup sheets be signed as indicated thereon, and returned to the control room for filing in the Current Valve Lineup File.

Contrary to the above, on April 20, 1981, the current system lineup check sheets (which were performed prior to startup from the January-May, 1980 refueling outage) on file for the following systems had not been signed by the Watch Engineer indicating his review and acceptance prior to system operation:

<u>Procedure Number</u>	<u>System</u>	<u>Appendix Not Signed</u>
2.2.21	HPCT	A and B
2.2.23	ADS	A
2.2.77	Drywell Leak Detection	A
2.2.32	Service Water	A
2.2.22	RCIC	A

In addition, the completed system valve lineup check sheets for the Low Pressure Coolant Injection (LPCI) and the Drywell Leak Detection System identified valves out of the normal position with no explanation or reason provided.

This is a severity level VI violation (Supplement I).

- C. 10 CFR 50.59 (b) states in part that "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."

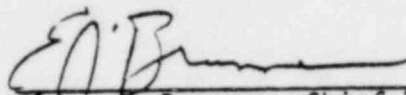
Contrary to the above, on April 27, 1981, modifications had been made to the Instrument Air and Service Air Systems as described in the FSAR Section 10.11.3, and FSAR Figure 10.11-1 (Instrument Air and Service Air P&ID), without a safety evaluation having been performed.

This is a severity level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Boston Edison Company 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) the corrective steps which have been taken and the results achieved (for Items A and C); (2) corrective steps which will be taken to avoid further violations (for Items A, B, and C); and (3) the date when full compliance will be achieved (for Items A, B, and C). 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 \_\_\_\_\_

JUN 02 1981



Eldon J. Brunner, Chief Projects  
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and Project Inspection