

APPENDIX A

NOTICE OF VIOLATION

Boston Edison Company
Pilgrim Nuclear Power Station
Plymouth, Massachusetts

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

As a result of the inspection conducted at Pilgrim Nuclear Power Station from October 2 to November 19, 1989 and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified.

Technical Specification 6.8.A requires that written procedures and administrative policies be established and implemented that meet or exceed the requirements of Section 5.1 of ANSI N18.7-1972. ANSI N18.7-1972, Section 5.1, "Rules of Practice," states that rules and instructions pertaining to personnel conduct and control and method of conducting operations shall be established. Section 5.1.2 states that procedures shall be followed.

Procedure 1.4.5, "PNPS Tagging Procedure," Revision 29, Step 6.5(4)(d) states that "the Nuclear Watch Engineer (NWE) on duty at the time the tagout is to be conducted shall give final approval prior to any tag placement ... When all of the above criteria are met, the NWE shall sign on the tagout sheet." Step 6.5(6)(a) states that "the NOS/NWE shall sign to authorize tagout removal after all job supervisor's have signed releasing the tagout." Step 6.9(4) states that "when leads are lifted for isolation and included on the Tag Sheet, they shall also be logged in the lifted lead and jumper log per PNPS 1.5.9.1."

Contrary to the above, during the period October 15 to November 10, 1989 deviations from the requirements of Procedure 1.4.5 were identified in that,

1. In a sampling of approximately 50 completed tagouts, there were errors or omissions on over 80%. Over 30% had errors such as tags hung or cleared without Nuclear Watch Engineer permission signature and tags hung or cleared by individuals other than those specified on the tagout.
2. In a sampling of about 10 tagouts involving work which required the lifting of leads or the installation of jumpers, over 50% of the jobs were not entered in the lifted lead and jumper log. Four of the instances noted involved the replacement of safety related components (e.g., Reactor Level Transmitter; Diesel Generator Emergency Start Relay).

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

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Pursuant to the provisions of 10 CFR 2.201, Boston Edison Company is hereby required to submit to this office within thirty days from the receipt 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.