

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 May 1-29, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified:

10 CFR 50, Appendix B, Criterion V, states, in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances..."

Technical Specification 6.8.A states, in part, that "Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972, and Appendix "A" of USNRC Regulatory Guide 1.33 ..."

Contrary to the above, the following are examples where station procedures were inadequate and not appropriate to the circumstances:

- (1) ANSI N18.7-1972, Section 5.3.2.4, states that "procedures should identify those independent actions or procedures that should be completed and plant conditions that should exist prior to its use."

Station Procedure No. 2.2.87, "Control Rod Drive System", Revision 8, does not require a Shutdown Margin calculation/verification (to ensure that Technical Specification Sections 3.3.A.2.b, 3.3.A.1, and 4.3.A.1 are met) prior to making a control rod inoperable. On May 21, 1981, control rod no. 22-35 was valved out of service in the full out position with the reactor at power. It was not until May 29, 1981 that the licensee received calculations from General Electric Co. which verified that the required Shutdown Margin had been met.

- (2) ANSI N18.7-1972, Section 5.3.4.4, states that "The limits (maximum and minimum) for significant process parameters should be identified. The nature and frequency of this monitoring shall be covered by operating procedures, as appropriate."

Station Procedure No. 2.2.70 "Primary Containment Atmospheric System", Revision 16, requires operation of the Standby Gas Treatment System, per procedure no. 2.2.50, when inerting and venting the drywell or torus. Technical Specification 4.7.B.1.a(6) requires a laboratory analysis of the charcoal filters of the Standby Gas Treatment System (SGTS) after every 720 hours of operation. Neither procedure (2.2.70, nor 2.2.50) specifies requirements to keep accurate times for each filter train of the SGTS. On May 6, 1981, the licensee was logging times that either the 'A' or 'B' SGTS fan was in operation, however, since April, 1981, the licensee had placed the SGTS dampers in the open position and therefore whenever either fan was run, both filters would be in operation.

- (3) ANSI N18.7-1972, Section 5.1, states that "In particular, written administrative policies shall be provided to control the issuance of documents, including changes ..."

Station Procedure No. 1.3.8, Document Control, Revision 25, was inadequate in that it does not address control of procedures which are posted at various locations throughout the station. At various times during May, 1981, copies of an out of date (retired) procedure No. 5.3.1, "Shutdown From Outside the Control Room", were posted in the Emergency Diesel Room, at ECCS equipment, and at 4160v and 480v switchgear.

- (4) ANSI N18.7-1972, Section 5.3.3, states that "Instructions for energizing, filling, venting, draining, startup, shutting down, changing modes of operation, and other instructions appropriate for operations of systems related to safety of the plant shall be delineated in system procedures..."

Station Procedures for operations of the Residual Heat Removal (RHR) System (2.2.86, Revision 13) and the Fuel Pool Cooling and Cleanup System (FPCCS) (2.2.85, Revision 8) were inadequate in that they did not specify the normal position of the RHR-to-Fuel Pool spectacle flanges, nor mention repositioning these flanges when using the FPCCS to clean up water from the torus via the RHR System.

- (5) ANSI N18.7-1972, Section 5.3.6, states that "...the procedures shall have provisions for meeting surveillance schedules and for assuring measurement accuracies adequate to keep safety parameters within operational and safety limits."

Technical Specification Table 3.7.1 specifies that the two RHR discharge isolation valves to radwaste must close in less than or equal to 20 seconds. Two of the licensee's procedures (8.7.4.3 "Test Isolation Valves Except MSIV's", Revision 5, and 8.5.2.1 "LPCI Subsystem Operability Surveillance Test", Revision 7) were inadequate in that they specified that the maximum acceptable closing time for the RHR to Radwaste Isolation Valves (1001-21, 1001-32) was 25 seconds.

- (6) ANSI N18.7-1972, Section 5.3.6, states that "...The procedures shall have provisions ... for assuring measurement accuracies adequate to keep safety parameters within operational and safety limits."

Procedure No. 8.7.1.8, "Local Leak Rate Testing of Feedwater Check Valves, Revision 2, was inadequate in that the acceptance criteria in Section IX was not consistent with Technical Specification Section 4.7.A.2.f.

- (7) ANSI N18.7-1972, Section 5.3.3, states that "Instructions for ..., filling, venting, draining,... shall be delineated in system procedures.

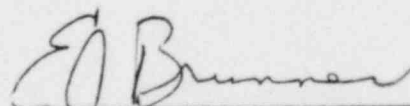
Procedure No. 8.7.1.5, "Local Leak Rate Testing of Primary Containment Penetrations and Isolation Valves", Revision 8, was inadequate in that many system figures (providing the lineup for individual valves) included incorrect locations for venting and draining during leak rate testing.

This is a Severity Level V violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Boston Edison Company is hereby required to submit to this office within thirty 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; (2) corrective steps which will be taken to avoid further violations; and (3) 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. Where good cause is shown, consideration will be given to extending your response time.

The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Dated           JUL 29 1981          



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