

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 January 18, 1982 - February 28, 1982, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 10 CFR 19.12 requires that all individuals working in or frequenting any portion of a restricted area shall be kept informed of the storage, transfer, or use of radioactive materials or of radiation in such portions of the restricted area.

Station Procedure No. 6.1-022, "Radation Work Permit", Revision 8, Section II, requires that the latest radiological survey data be posted at the work area or with the RWP. Section VI.C.9.a requires that if it becomes necessary to change dress requirements or instructions, an RWP revision sheet shall be completed showing these changes. Section VI.D.1 further requires that all persons who are to enter the work area be briefed by an HP representative on the physical and radiological conditions in the work area.

Contrary to the above, at about 8:20 a.m. on January 29, 1982, workers entering the Standby Gas Treatment Room (a restricted area) were not informed of the storage of about 100 gallons of dry radioactive spent resin. The latest radiological survey performed at 11:00 p.m. on January 28, 1982 was not posted at the work area or with the pertinent RWP covering these workers; an RWP revision sheet was not completed showing necessary changes in dress requirements; and, the workers were not briefed by an HP representative on the actual physical and radiological conditions in the area.

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

- B. Technical Specification 6.8.D requires that written procedures to implement the Fire Protection Program be established, implemented and maintained.

Pilgrim Nuclear Power Station Fire Protection Plan dated August 10, 1978, Section IV.6, specifies that the Fire Prevention and Protection Officer is responsible for inventory, inspection, and replacement of fire fighting equipment, and also requires that, after the use of this equipment during each exercise, drill, or fire emergency, that it be inspected, tested, and verified to ensure that it has been restored to its original function and capability.

Station Procedure No. 6.7-108, Operating Instructions for Breathing Air Charging System, Revision 0, requires that air bottles for ten Self Contained Breathing Apparatus (SCBA) units and twenty spares be fully charged in order to sustain ten men for six hours.

Contrary to the above, on January 28, 1982, written procedures to implement the Fire Protection Program were not established to assure an adequate inventory of fire protection equipment in that only 29 of the 30 required SCBA bottles were fully charged and only 7 of these 30 bottles had current hydrostatic test dates and could have been recharged. This was an insufficient number of rechargeable bottles to meet the 10 men for six hours self contained breathing requirements.

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) the 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 _____

MAR 23 1982


Richard W. Starostecki, Director
Division of Project and Resident
Programs