

**ENCLOSURE 1
NOTICE OF VIOLATION**

Northeast Nuclear Energy Company
Millstone Nuclear Power Station
Units 1 & 2

Docket Nos.: 50-245 50-336
License Nos.: DRP-65 DPR-21

During an NRC inspection conducted on September 29, 1993 through November 16, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Millstone Unit 1 Technical Specification 6.8.1 requires, in part, that written procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operation)," dated February 1978. Section 9.a of Appendix A to RG 1.33 requires, in part, that maintenance that can affect the performance of equipment important to safety should be properly performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances. Section 9.e requires administrative procedures for the control of maintenance. Administrative Control Procedures ACP-QA-2.02C, "Work Orders" was established pursuant to the above.

Contrary to the above, on or about May 13, 1993, maintenance activities performed on Unit 1 emergency lighting units were not accomplished in accordance administrative control procedures. Specifically, procedure ACP-QA-2.02C, Step 2.1 requires an approved work order to control and document work activities performed on installed equipment where component isolation and/or fire protection quality assurance is required. However, no work order was written and approved to control the maintenance of these emergency lighting units.

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

- B. Millstone Unit 2 Technical Specification 6.8.1 requires, in part, that written procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operation)," dated February 1978. Section 9.a of Appendix A to RG 1.33 requires, in part, that maintenance that can affect the performance of equipment important to safety should be properly performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances. Sections 9.e and 1.c require administrative procedures for the control of maintenance and equipment (e.g. tagging). Administrative Control Procedures ACP-QA-2.02C, "Work Orders," and ACP-QA-2.06A, "Equipment Tagging," were established pursuant to the above.

Contrary to the above, on October 19, 1993, maintenance activities performed on Unit 2 letdown system manual isolation valve 2-CH-339 were not accomplished in accordance with administrative control procedures as evidenced by the following examples:

- a. Procedure ACP-QA-2.02C, Step 6.6.2 requires that the Job Leader/Supervisor shall record actual work completed on an automated work order when work is completed. However, neither the maintenance mechanic nor the job supervisor accurately documented the actual work performed on valve 2-CH-339 on the automated work order.
- b. Procedure ACP-QA-2.02C, Step 6.6.1.1 requires the Job Leader/Supervisor to verify the adequacy and placement of safety tagging, and ACP-QA-2.06A, Step 6.5.2.1 requires the Job Leader/Supervisor to identify the need to change a tagging boundary, inform the Shift Supervisor/Senior Control Operator/Senior Reactor Operator (SS/SCO/SRO), and contact all personnel holding the same tag clearance when a change to the tag boundary needs to be made. However, the Job Leader/Supervisor failed to assure that the maintenance area isolation was adequate for work to be performed on valve 2-CH-339, and did not inform all personnel holding the same tag clearance of a leaking boundary valve.
- c. Procedure ACP-QA-2.02C, Step 6.6.7 requires the Job Leader to verify that a component is ready to turnover to the Operations Department for retest following the completion of work. However, the Job Supervisor did not verify adequately that valve 2-CH-339 was ready for retest prior to turnover of the automated work order to the Operations Department.
- d. Procedure ACP-QA-2.06A, Step 6.5.2.2 for modifying work boundaries requires the SS/SCO/SRO to assemble all automated work orders and tag clearances, change tags and clearance logs, modify the maintenance isolation boundary, and reissue the automated work orders to Job Leaders to accommodate modifications to tagging boundaries. However, when apprised of leakage past boundary valve 2-CH-338, the SS/SCO/SRO did not assemble the automated work order for valve 2-CH-339 affected by tag clearance 2-2100-93, change tags and clearance logs, modify the maintenance isolation boundary, and reissue the work authorization for valve 2-CH-339 prior to continuing work protected by the tag clearance.

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

- C. Millstone Unit 2 Technical Specification 6.8.1 requires, in part, that written procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide (RG) 1.33, "Quality Assurance

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Program Requirements (Operation)," dated February 1978. Section 9.a of Appendix A to RG 1.33 requires, in part, that maintenance that can affect the performance of equipment important to safety should be properly performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Contrary to the above, on September 24, 1992 and November 16, 1992, the spring preload of the air-actuators on Unit 2 letdown system isolation valves 2-CH-089 and 2-CH-515, respectively, were adjusted without the use of written procedures, documented instructions, or drawings, resulting in excessive valve seat leakage at normal reactor coolant system pressure.

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

Pursuant to the provisions of 10 CFR 2.201, Northeast Nuclear Energy Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at King of Prussia, Pennsylvania
this 2nd day of February, 1994

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