

APPENDIX A

NOTICE OF VIOLATION

Northeast Nuclear Energy Company  
Millstone Unit No. 2

Docket No. 50-336  
License No. DPR-65

As a result of the inspection conducted on June 27 through August 7, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987 (March 9, 1982), the following violations were identified:

1. Technical Specification 6.8.1 and Regulatory Guide 1.33, dated November 3, 1972, require that written procedures be established, implemented, and maintained for startup, operation, and shutdown of safety-related systems, including the containment cleanup system and that control of plant status be maintained through such administrative measures as log entries.
  - a. Operating Procedure OP2314B, "Containment and Enclosure Building Purge", revision 5, requires in step 7.1.4.e that valve 2-AC-8 be verified closed prior to initiating containment purge operations.

Contrary to that requirement, valve 2-AC-8 was not verified closed on July 23, 1982 prior to initiating contained purge operations. The valve was, in fact, open, and its position contributed to an unplanned release of radioactive material on July 23 and 24, 1982.

- b. Operating Procedure OP2314B, "Containment and Enclosure Building Purge", revision 5, requires in a note to section 7 that the times of starting and stopping containment purge be recorded in the Shift Supervisor's Log.

Contrary to the above, no entry appears in the Shift Supervisor's Log regarding securing containment purge.

- c. Administrative Control Procedure ACP10.05, "Log Book Requirements (Control Room)", revision 1, requires that the Shift Supervisor's Log contain a record of "unit operating information", including "radiation hazards", "deviation in operation", "damage or malfunction of any major equipment, process system . . ." and other significant events and evolutions.

Contrary to the above, the Shift Supervisor's Log does not provide information regarding the unplanned and uncontrolled release of radioactivity on July 23 and 24, 1982.

This is a Severity Level IV violation (Supplement I) applicable to DPR-65.

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2. Title 10, Code of Federal Regulations, part 50.72(a)(8), requires that the Nuclear Regulatory Commission Operations Center be notified within one hour of the occurrence of "any accidental, unplanned, or uncontrolled radioactive release."

Contrary to the above, on July 23, 1982 the Nuclear Regulatory Commission Operations Center was not notified of an unplanned, radioactive release until approximately 16 hours after it occurred.

This is a Severity Level IV violation (Supplement I) applicable to DPR-65.

Pursuant to the provisions of 10 CFR 2.201, the Northeast Nuclear Energy Company is hereby required to submit to this office within 30 days of the date of this Notice a written reply stating the corrective steps which have been taken and the results achieved, corrective steps which will be taken to avoid further violations, and 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.

Dated SEP 1 1982

Original Signed By: E. J. Brunner for  
Richard W. Starostecki, Director  
Division of Project and Resident  
Programs