

APPENDIX A
NOTICE OF VIOLATION

Boston Edison Company
Pilgrim Nuclear Generating Station

Docket No. 50-293
License No. DPR-63

As a result of the inspection conducted on November 5 - 9, 1990, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) the following violations were identified:

1. 10 CFR 20.301, Waste Disposal, General requirements, states in part that no licensee shall dispose of licensed material except by transfer to an authorized recipient or as authorized pursuant to 20.302 or Part 61 of this chapter.

Contrary to the above, on October 31, 1990 an article contaminated with licensed radioactive material was released for unrestricted use by transfer to a recipient not authorized to receive licensed material, and without authorization pursuant to 20.302 or Part 61.

This is a Severity Level IV violation (Supplement IV).

2. Technical Specifications Section 6.8, "Procedures and Programs", requires, in part, that written procedures shall be established, implemented, and maintained.

A. Procedure 6.9-218, Operation and Control of the Trash Compacting Facility (TCF), section 6[3], states that non-radioactive waste is not to be processed out of the TCF without documented survey results.

Contrary to the above, on October 31, 1990 and for an undetermined period prior to this date, non-radioactive trash was processed in the TCF and released without performing a survey.

B. Procedure 6.9-218, Operation and Control of the Trash Compacting Facility (TCF), section 7.1,2, states that the access door to the waste compactor is to be locked any time it is not attended by an RP technician who is surveying material for release. The key is to be in the possession of the shipping and storage supervisor/designee.

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Contrary to the above, during the period October 26 - 31, 1990, and for an undetermined period prior to that date, the access door was not locked and the key controlled in the manner required by the procedure.

The above constitute a Severity Level IV Violation
(Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Boston Edison 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 if applicable, 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. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending this response time.

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