

**ENCLOSURE 1
NOTICE OF VIOLATION**

Northeast Nuclear Energy Company
Millstone Nuclear Power Station
Unit 1

Docket No.: 50-245
License No.: DPR-21

During an NRC inspection conducted on February 23, 1994 through April 5, 1994, 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. Unit 1 Technical Specifications 6.8.1.a and 6.8.2, respectively, require that written procedures be established covering the activities contained in Appendix A of Regulatory Guide (RG) 1.33, dated February 1978, and that these procedures be reviewed and approved by the plant operations review committee (PORC). RG 1.33, "Quality Assurance Program Requirements (Operation)," Appendix A, Step 9.a, requires that maintenance performed on safety-related equipment be performed in accordance with written procedures appropriate to the circumstances. Pursuant to the above, administrative control procedure ACP-QA-2.02C, "Work Orders," Step 6.2.9.1, states that an approved procedure is required for disassembly, repair, and reassembly of all Category I (safety-related) equipment whenever implementation requires unique or complex instructions.

Contrary to the above, on or about March 3, 1994, procedures were not established and reviewed by PORC for the refurbishment of emergency diesel generator air start system solenoid-operated valves AS-1 and AS-2 performed under automated work orders M1-92-05707 and M1-92-05726, respectively. These maintenance activities required implementation of complex instructions beyond the skills of qualified maintenance technicians.

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

- B. 10 CFR Part 50, Appendix B, Criterion III, "Design Control," requires that measures shall be established for the selection and review of suitability for application of parts that are essential for the safety-related functions of components. Procedures ACP-QA-4.03A, "Upgrading Spare Parts For Use In QA Application - Commercial Grade Item Procurement and Dedication," and ACP-QA-2.02C, "Work Orders," were established pursuant to the above.

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Procedure ACP-QA-4.03A, Revision 7, dated October 23, 1990, Steps 6.1.2.e and 6.1.2.f require an evaluation to be performed of differences between originally installed and replacement commercial grade parts, and to identify and verify critical characteristics to ensure that original seismic qualification is maintained.

Procedure ACP-QA-2.02C, Step 6.6.1.29.a and an accompanying note requires commercially dedicated parts to be controlled per the requirements of procedure ACP-QA-4.03A. Procedure ACP-QA-4.03A (Revision 10, dated July 28, 1992). Steps 6.5.3 and 6.5.3.2, respectively, requires the job supervisor to transfer required tests from commercial grade dedication forms to Station Form (SF) 1419, "Product Acceptance Test/Preoperational Test," and requires the Plant Quality Services Department to review the work order package.

Contrary to the above:

1. In February 1991, commercial grade parts were dedicated for use in safety-related emergency diesel generator solenoid-operated valves AS-1 and AS-2 without an adequate evaluation of the differences between the original and the replacement parts, and without adequate identification and verification of critical characteristics to ensure that the original seismic qualification was maintained. These parts were installed on or about March 3, 1994.
2. On February 26, 1994, the job supervisor did not transfer to form SF-1419 the acceptance tests from the commercial grade dedication forms for the rebuild kits and replacement coils used for valves AS-1 and AS-2, and the Plant Quality Services Department did not review the work order packages for valves AS-1 and AS-2.

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 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. Where good cause is shown, consideration will be given to extending the response time.

Dated at King of Prussia, PA
this 27th day of May, 1994

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