

APPENDIX A

NOTICE OF VIOLATION

Northeast Nuclear Energy Company
Millstone Nuclear Power Station
Unit 2

Docket No.: 50-336
License No.: DRP-65

A violation of NRC requirements was identified during an NRC inspection conducted between October 21 through December 16, 1991. In accordance with the "General Policy Statement and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy), the violation is listed below.

Millstone Unit 2 Technical Specification 6.8.1.a. requires, in part, that written procedures be established, implemented, and maintained, as recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, recommends procedures for administrative control of surveillance testing.

- Administrative Control Procedure (ACP)-QA-3.02E, section 6.2, states that "full and total compliance is expected" for those procedures used to do surveillance and testing as specified in the Technical Specifications.

Contrary to the above, on November 13, December 4 (two instances), and December 12, 1991, the NRC observed some steps in surveillance tests 2401B-1, 2401F-1, 2404A1-1, and 2405A-1, respectively, that were either not done as specified or were done out of sequence.

- ACP-QA-3.02D, section 6.1.1, requires a periodic, systematic review of station procedures required by ACP-QA-3.02. ACP-QA-3.02, section 6.2.3, including 2400-series surveillance procedures (SP) and maintenance (IC) procedures.

Contrary to the above, the biennial review of procedures IC 2402I, IC 2416G, IC 2404AN and SP 2404AZ was not done in a timely manner. In a quarterly memorandum (MP-91-918), dated November 1, 1991, Document Services identified the required biennial review due date for those procedures as December 1, 1991.

- ACP-QA-2.06C, section 6.2.3.3, states (in part) "Perform an independent verification of each lifted lead or jumper installed." This requirement applies to quality related systems.

Contrary to the above, installation of jumpers in surveillance 2404A1-1 on December 4, 1991 received dual but not independent verification.

In the aggregate, these instances represent a severity level IV Violation. (Supplement I.D)

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 1, and if applicable, a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation. 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.