

APPENDIX A

NOTICE OF VIOLATION

Boston Edison Company  
Pilgrim Nuclear Power Station

Docket No. 50-293  
License No. DPR-35

As a result of the inspection conducted on April 24-27, 1984, and in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register on March 8, 1984 (49 FR 8583), the following violations were identified:

- A. Technical Specification 6.8.A states "Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7 - 1972 and Appendix "A" of USNRC Regulatory Guide 1.33..."

Technical Specification 6.8.B states "Each procedure ... and changes thereto, shall be reviewed by the ORC and approved by the ORC Chairman prior to implementation ..."

Contrary to the above, the licensee had used three contractor procedures during 1984, and the procedures have not been reviewed by the ORC (Operating Review Committee) and neither have they been approved by the ORC Chairman.

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

- B. 10 CFR 71.12(c) requires that a person using a package to transport licensed material must have a copy of the Certificate of Compliance, and the person must also comply with the conditions of the Certificate.

1. Certificate of Compliance No. 6601, Revision No. 13, Condition 5(b)(2) requires that the decay heat load not exceed 40 thermal watts.

Contrary to the above, the licensee did not determine the decay heat load of a package of 118 curies of licensed material shipped on February 10, 1984, having the Certificate of Compliance No. 6601.

2. Condition 10 of Certificate of Compliance 6601, Revision No. 13 states, "For all packages containing residual water or other substances which could radiolytically generate combustible gases, a determination must be made by tests and measurements of a representative package such that the following criteria are met over a period of time that is twice the expected shipment time:

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- (i) The hydrogen generated must be limited to a molar quantity that would be no more than 5% by volume (or equivalent limits for other inflammable gases) of the secondary container gas void if present at STF (i.e., no more than 0.063 g. moles/ft<sup>3</sup> at 14.7 psia and 70°F); or
- (ii) The secondary container and cask cavity must be inerted with a diluent to assure that oxygen shall be limited to 5% volume in those portions of the packages which could have hydrogen greater than 5%.

For packages to be delivered to a carrier for transport, the secondary container must be prepared for shipment in same manner in which determination for gas generation is made..."

Contrary to the above, on February 10, 1984, the licensee used package Model No. CNSI 8-120, Certificate of Compliance 6601, to transport 118 Curies of licensed material to Barnwell, South Carolina, and the licensee did not determine by tests or measurements that the criteria described above were met.

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

- C. 10 CFR 71.101(b) requires each license to establish a quality assurance program for packages. 10 CFR 71.101(f) states that a Commission approved quality assurance program which satisfies the applicable criteria of Appendix B of Part 50 of this chapter, and which is established, maintained, and executed with regard to transport packages will be accepted as satisfying the requirements of paragraph (b) of this section. Paragraph (b) requires that licensees establish, maintain, and execute a quality assurance program.

Criteria II, Appendix B of Part 50 of the licensee's previously approved program requires that the licensee identify the structures, systems, and components to be covered by the quality assurance program.

Contrary to the above, as of April 27, 1984, the licensee has not identified transport packages as a structure, system, or component to be covered by the quality assurance program.

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

Pursuant to the provisions of 10 CFR 2.201, Boston Edison Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.