

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 May 9-11, and 14-16, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 19.12, "Instructions to Workers", requires that "All individuals working in or frequenting any portion of a restricted area shall be kept informed of the storage, transfer, or use of radioactive materials or of radiation in such portions of the restricted area; shall be instructed in the health protection problems associated with exposure to such radioactive materials or radiation, in precautions or procedures to minimize exposure, and in the purposes and functions of protective devices employed".

Contrary to the above, on May 7, 1984, the licensee failed to adequately inform a worker of the presence and extent of radioactive contamination and radiation in the 'A' Residual Heat Removal (RHR) quadrant. The worker was not advised to use respiratory protective equipment and plastic protective clothing; consequently, the worker was subjected to internal and external personal contamination.

This is a Severity Level IV violation (Supplement IV)

- B. 10 CFR 20.201, "Surveys", requires that "Each licensee shall make or cause to be made such surveys [evaluations of the radiation hazards incident to the production, use, release, disposal or presence of radioactive materials] as (1) may be necessary for the licensee to comply with the regulations in this part, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present".

Contrary to the above:

1. On May 7, 1984, the licensee failed to make an evaluation of the 'A' RHR quadrant to support the entry of a worker performing operations in the area. The radiological conditions of the area were not evaluated sufficiently to identify the need for respiratory protective measures in accordance with 10 CFR 20.103 and provisions for controlling personnel occupational exposure in accordance with 10 CFR 20.101.

2. On April 19, 1984, personnel removed the spool piece from the 'B' Recirculation Loop in the drywell, without a radiological evaluation being performed in support of the activity. Such radiological surveillance was required in order to assure that adequate radiological controls were established consistent with the requirements of 10 CFR 20.101 and 10CFR 20.103.

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

- C. Technical Specification 6.11, "Radiation Protection Program", requires that "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be ...adhered to for all operations involving personnel radiation exposure".

Contrary to the above, on May 7, 1984, Health Physics Procedure No. 6.4-067, "Operation of the Eberline RM-14 Radiation Monitor", which provides instructions for use of the instrument as a monitoring device to determine personnel contamination was not followed. An individual who was significantly contaminated from work performed in the 'A' RHR quadrant, failed to frisk in accordance with the directions stated in the procedure sufficient to detect and properly respond to the presence of significant levels (in excess of 200,000 dpm/100 cm<sup>2</sup>) of radioactive contamination on skin and clothing.

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

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.