

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 October 1-5, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

10 CFR 50, Appendix B, Criterion III, Design Control, states in part, "Design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design..."

Contrary to the above, as of October 4, 1984, the installation of anchor bolts in safety related concrete floors in the reactor building as part of Plant Design Change 84-18 was being accomplished with inadequate design control as evidenced by the following:

1. General note 3 on Boston Edison Company drawing SK-C-84-18-04 for installation of anchor bolts for concrete floors supported on steel framing allows one rebar in each direction in the top rebar steel at each anchor bolt location to be cut. However, no documented design bases existed for such cutting of rebar.
2. The lack of control inherent in general note 3 permitted the unnecessary cutting of rebar, without considering preferable alternatives, and caused no record to be kept of the cut rebar.

As a result of the above, the structural adequacy of such floors in their existing condition with unknown amounts of cut rebar could not be demonstrated.

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

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.

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## APPENDIX B

### LICENSEE STRENGTHS

The inspection team noted specific features of the licensee's programs and activities which have been characterized as strengths. A strength is a positive attribute or feature which exceeds regulatory requirements, or an innovative feature, which contributes to the safety or effectiveness of plant activities. References are to sections in Inspection Report 50-293/84-28.

1. The licensee maintains strong management control of modification generated changes to operator training, drawings, procedures, and technical specifications. The establishment of an independent group to coordinate the identification of the necessary changes prior to the final design change approval and to track the completion of these activities prior to plant acceptance for operation is a primary part of this function. Further, periodic reports identifying the status of these activities on each individual design change are an aid to the licensee's management control. (5.)
2. The completeness of the training material for licensed operators on plant design changes is excellent. A licensed senior reactor operator within the training Department reviews all design changes to determine the need for training, prepares a summary of the changes, including illustrations of the changes and descriptions of the effect on plant operations, obtains approval of the technical content of the training material, and presents classroom instruction on these changes, including good visual aids. (6.)

## APPENDIX C

### LICENSEE WEAKNESSES

The inspection team identified items of concern which have been characterized as weaknesses. An item of weakness does not constitute noncompliance with regulatory requirements, rather it is related to effectiveness of a program, activity or organization. References are to paragraphs in Inspection Report 50-293/84-28.

1. Control of nonconforming conditions during modification work needs improvement. Specific examples of this weakness included the following:
  - A nonconforming safety relief valve was used to aid fit-up of piping. The valve had no tag or identification to show its nonconforming status. (3.1)
  - A piping gouge needing a Nonconformance Report (NCR) and the associated engineering review for resolution was allowed to exist as a Surveillance Inspection Report (SIR) for three weeks. (3.1)
  - The administrative control of SIRs is poor. The procedure describing SIRs does not address review, resolution, or approval, but only describes how an inspector is to complete the form. (3.1)
2. There is no P&ID drawing for the emergency diesel air start system. (3.2)
3. Preoperational test procedures lack an independent verification of the system restoration following the test. Also, the check-off list in the operating procedure for HPCI lacks two spectacle/blind flanges located in the system. (3.3)
4. Administrative control of the turnover from construction to preoperational testing needs improvement. Specifically, there is no formal means to document the findings, exceptions, and system status identified during the turnover process. (4.1)