

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 November 21, 1984 - December 31, 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 XVI Corrective Action, requires that measures be established to assure that conditions adverse to quality, such as failures, malfunctions and deviations are promptly identified and corrected.

Nuclear Operations Procedure No. 8305 dated May 2, 1984, (The Failure and Malfunction Report Process), and Station Procedure No. 1.3.24, dated April 11, 1984 (Failure and Malfunction (F&M) Reports) require that F&M Reports be initiated for deviations, failures, or malfunctions that could prevent systems from fulfilling their functions. F&M Reports are intended to:

1. Provide prompt notification of important plant conditions and events.
2. Ensure initial internal review and safety assessment of events of potential safety consequences.
3. Provide information for determination of event reportability to the NRC.
4. Document the initiation/completion of (and/or compensatory) immediate corrective action.

Contrary to the above, measures were not established to assure that conditions adverse to quality are promptly identified and corrected in that procedures 8305 and 1.3.24 do not provide a time limit for initiation of F&M Reports.

As a consequence, in the following cases,

- Deviations in piping supports for the Core Spray and Residual Heat Removal Systems identified during inspections between September 15 - October 7, 1984, but not reported on a F&M Report until November 19, 1984.
- A through wall leak in reactor coolant pressure boundary weld identified on November 30, 1984, but not reported on a F&M Report until December 17, 1984.

the F&M Reports did not provide for prompt notification of important plant conditions, did not ensure initial internal review and safety assessment of events of potential safety significance in that core reload occurred between identification of hanger deficiencies in the RHR and Core Spray Systems and

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determination of their effect on system operability, did not result in timely notification of NRC via ENS calls in that NRC was not notified until November 19 and December 17, 1984, respectively, of the above two conditions and did not document the initiation/completion of immediate corrective actions.

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

Pursuant to the provision 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.