

NOTICE OF VIOLATION

North Atlantic Energy Service Corporation
Seabrook Station, Unit 1

Docket No. 50-443
License No. NPF-86

During an NRC inspection conducted on February 5 - April 1, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

- A. Seabrook Station Technical Specification 6.7.1 requires that written procedures shall be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33 requires licensee's to establish and implement administrative procedures for safety-related activities.

Station Management Manual, Chapter 2, Policies, Section 7, Housekeeping/Cleanliness/Foreign Material Exclusion requires that controls for foreign material exclusion from systems and components shall be implemented per procedure MA 3.4, Foreign Materials Exclusion. Procedure MA 3.4, Section 4.1 General Requirements, requires critical equipment important to safe operation and shutdown of the plant shall receive FME considerations and that openings shall be appropriately covered to prevent entry of dust, dirt, or other foreign objects.

Contrary to the above, on February 27, 1996, the inspector identified that temporary jumpers, which are used to perform surveillance testing of instrument air check valves associated with the steam admission valve MS-V-395 for the risk significant safety-related turbine driven emergency feedwater (EFW) pump in accordance with procedure OX 1436.02 section 8.2.43, did not have foreign material exclusion (FME) covers installed.

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

- B. The Seabrook, Units 1 and 2, Physical Security Plan, Revision 19, dated April 26, 1995, Section 3.1, states, in part, that all elements of NRC Regulatory Guide 5.66 have been implemented to satisfy the requirements of 10 CFR 73.56.

One of the requirements of 10 CFR 73.56, as stated in Section (b)(2)(iii), is that the unescorted access authorization program must include behavioral observation, conducted by supervisors and management personnel, designed to detect individual behavioral changes which, if left unattended, could lead to acts detrimental to the public health and safety. Additionally, one of the elements of Regulatory Guide 5.66, as noted in Section 3, under the "Clarification to the Guidelines," is that prior to the reinstatement of an employee's access authorization, it is reasonable to expect that the licensee will ascertain that the activities the employee was engaged in during his or her absence would not have the potential to affect the employee's trustworthiness and reliability.

To satisfy the physical security plan commitments, the licensee's continual behavioral observation program requires as documented in the Seabrook Station Security Program (SSSP), Revision 16, Section 3.9, titled "Reinstatement of Unescorted Access Authorization," that if more than 30 days have lapsed since an individual was at Seabrook Station, conduct an interview with the individual to ascertain that the activities of the individual during his or her absence would not affect his or her trustworthiness and reliability.

Contrary to the above, the licensee had developed a procedure which addressed contractors with unescorted access into the protected area that are away from Seabrook Station for more than 30 days and have not been under a continual behavioral observation program, but the North Atlantic Energy Service Corporation failed to effectively implement the procedure. Therefore, the requirements for the reinstatement of unescorted access authorization relative to the continual behavioral observation program were not being met.

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

Pursuant to the provisions of 10 CFR 2.201, North Atlantic Service Corporation 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 I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Docket Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding information from the public.

Dated at King of Prussia, Pennsylvania
this 29th day of April, 1996