

**ENCLOSURE 1
NOTICE OF VIOLATION**

Northeast Nuclear Energy Company
Millstone Nuclear Power Station
Units 1 and 2

Docket Nos.: 50-245, 50-336
License Nos.: DRP-21, DRP-65

During an NRC inspection conducted on July 26, 1992, through September 7, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), the violations are listed below:

- A. 10 CFR 50 Appendix B, Criterion VII (Control of Purchased Material, Equipment, and Services) requires, in part, that measures be established to assure that purchased services conform to purchase requirements. These measures shall include provisions for source evaluation and selection, and examination of products upon delivery.

Nuclear Engineering and Operations (NEO) procedure 6.02, "Quality Purchase Requisitions," section 6.5 requires, in part, that services be procured on a quality purchase requisition when the service is applicable to safety related equipment. Quality Services Department (QSD) procedure 3.02, "Supplier Evaluation," section 6.1 requires, in part, that procurement vendor services personnel perform an evaluation of a supplier when a need is established for use of a supplier not on the approved supplier list.

Contrary to the above, during July and August 1992, a purchase requisition was not issued prior to using engineering services procured from Saul Levy Incorporated (SLI) to perform analyses on safety-related systems and components. Additionally, procurement vendor services had not performed an evaluation of SLI prior to NRC identification that SLI was not listed on NNECO's approved supplier list.

This is a Severity Level IV Violation (Supplement I). This violation applies to Unit 1 only.

- B. The Millstone Nuclear Power Station Physical Security Plan, Revision 16, dated March 1992, Section 11.5, "General Construction Activities," requires, in part, that when large equipment movement and other construction-related activities take place within protected or vital areas, compensatory measures are to be taken to assure that security is not diminished. These compensatory measures include the use of watchmen or guards for surveillance, closed circuit television, escorts, and temporary cordons.

Contrary to the above, for a period of about 50 hours between August 8 and August 11, 1992, the licensee failed to establish and maintain adequate compensatory measures for the extended vital area boundary in Unit 2.

This is a Severity Level IV Violation (Supplement III). This violation applies to Unit 2 only.

- C. 10 CFR 50 Appendix B, Criterion III (Design Control) requires that measures be established for the selection and review for suitability of application of materials, parts, and equipment that are essential to the safety-related functions of the structures, systems, and components.

The Northeast Utilities Quality Assurance Program, Paragraph 3.2.1, requires that standard "off the shelf" commercial or previously approved items essential to the quality functions be selected and reviewed for suitability of application.

Administrative Control Procedure (ACP) QA-4.03A, "Upgrading Spare Parts for Use in QA Application - Commercial Grade Item Procurement and Dedication," implements the above and delineates the requirements for the specification, procurement, acceptance, and handling of the procurement and dedication of commercial grade items for safety-related applications. ACP-QA-4.03A requires that Standard Form 1417 be completed documenting the dedication evaluation, including identifying critical characteristics and acceptance methods for verifying critical characteristics.

Contrary to the above,

1. The new commercial grade motor and gearbox installed on the "A" emergency service water strainer (ESW) in September 1991 were not dedicated, as required by procedure ACP QA-4.03A, prior to installation.
2. The replacement strainer body installed in the "A" train of ESW in August 1991, was accepted based on an inadequate dedication in that the commercial grade pressure boundary materials and weld wire used in fabricating the strainer body were accepted without verifying the validity of the commercial grade certified material test reports as required by procedure ACP-QA-4.03A.

This is a Category Level IV violation (Supplement I). This violation applies to Unit 1 only.

Pursuant to the provisions of 10 CFR 2.201, Northeast Nuclear Energy Company 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 within 30 days of the date of the letter transmitting this Notice of Violation (Notice). 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. Where good cause is shown, consideration will be given to extending the response time.