

NOTICE OF VIOLATION

Boston Edison Company M/C Nuclear
Pilgrim Nuclear Power Station

Docket No. 50-293
License No. DRP-35
EA 85-104

On July 16-30, 1985, an NRC special inspection was conducted to review the circumstances associated with two violations of the Technical Specifications, one of which was identified by the licensee and reported to NRC. In each case, abnormal plant conditions were identified by the non-operational staff, but a Failure and Malfunction Report (F&MR) was not immediately initiated, as required, to ensure prompt review by the operations staff of the potential safety significance of the malfunctions. As a result, actions required by the Technical Specifications were not taken, as required. The failure to promptly complete the F&MR in each case constitutes a third violation of NRC requirements.

In accordance with the NRC "General Statement of Policy and Procedure for Enforcement Actions", 10 CFR 2, Appendix C (Enforcement Policy), the violations are set forth below:

- A. Technical Specification Limiting Condition for Operation 3.7.C.1 requires, in part, that whenever the reactor is critical, secondary containment integrity be maintained. Section 1.N of the Technical Specifications defines secondary containment integrity and requires as one of its conditions that all automatic ventilation system isolation dampers must be operable or secured in the closed position.

Contrary to the above, for approximately 19 hours between 3:00 p.m., July 15, 1985 and 10:00 a.m., July 16, 1985, secondary containment integrity was not maintained while the reactor was critical in that automatic ventilation system isolation damper AO-N-90 in the exhaust ventilation duct from the refueling floor was identified as open and inoperable at 3:00 p.m. on July 15, 1985, and the damper was not secured in the closed position until 10:00 a.m. on July 16, 1985.

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

- B. Technical Specification (T.S.) Surveillance Requirement 4.5.F.1 specifies that when one diesel generator is inoperable, the remaining diesel generator, and all low pressure core cooling and containment cooling systems shall be tested immediately and daily thereafter.

Contrary to the above, on July 23, 1985, Diesel Generator A was found to be inoperable because the water and sediment content in the diesel fuel tank T-126A was in excess of the limits in Table 1 of ASTM D975-77, required by T.S. 4.9.A.1.e, and the remaining diesel generator, the low pressure core cooling subsystems, and containment cooling subsystems were not tested until July 26, 1985.

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

- C. Technical Specification 6.8.A requires, in part, that written procedures be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7 - 1972 and Appendix "A" of NRC Regulatory Guide 1.33.

Station Procedure 1.3.24, Failure and Malfunction Reports, Revision 11, dated February 6, 1985, written as required by T.S. 6.8.A states that (1) a Failure and Malfunction Report (F&MR) shall be initiated whenever malfunctions identified during surveillance testing of safety related components could prevent the components from fulfilling their intended functions and (2) the objective of the F&MR is to ensure an adequate initial review of events with potential safety significance.

Contrary to the above,

1. At 3:00 p.m. on July 15, 1985, secondary containment ventilation damper AO-N-90 was identified as malfunctioning (would not fully close) during a routine damper surveillance inspection, and an F&MR was not initiated.
2. On July 23, 1985, water and sediment in excess of limits was discovered in the T-126A diesel generator fuel oil storage tank during a monthly surveillance test, and a F&MR was not initiated.

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 for each violation, (1) the 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.