

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 January 20 to March 5, 1988 and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified. In both the cited instances, prompting by the NRC inspector was required to avoid additional unplanned ESF actuations which would have resulted from continuing activities as specified in licensee-approved procedures and instructions.

Technical Specification 6.8.A, states that written procedures shall be established and implemented that meet the requirements and recommendations of sections 5.1 and 5.3 of ANSI N18.7-1972.

ANSI N18.7-1972, Section 5.1, states that policies shall be provided to control the issuance of documents, including maintenance or modification procedures. These policies shall assure that documents are reviewed for adequacy. Section 5.1.6 states that maintenance and modifications that may affect functioning of safety-related systems shall be performed in a manner to assure quality, and shall be properly preplanned and performed in accordance with detailed written procedures.

Contrary to the above, implementation and testing of certain modifications was not properly preplanned and was not performed in a manner to assure quality. Further, established policies did not assure that procedures were properly reviewed for adequacy, in that approved modifications procedures were found to be technically inadequate.

1. On February 2, 1988, instructions contained in approved Plant Design Change (PDC) 83-51D for installation of computer point ISO 726 were inadequate. The computer signal cut-in sheet for ISO 726 did not specify adequate steps to prevent interruption of a common ground in the containment isolation system logic. As a result, unanticipated Engineered Safety Feature (ESF) actuations occurred during performance of the cut-in.
2. On February 10, 1988, approved post-modification test Procedure TP 88-09, Electrical Plant Line-up for Blackout Diesel Generator Load Test, Revision 0, was inadequate. Performance of TP88-09 as written and approved would have resulted in an unanticipated automatic start of the "B" Emergency Diesel Generator (EDG). Adequate steps to prevent or to prepare for the EDG start were not included.

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

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Pursuant to the provisions of 10 CFR 2.201, Boston Edison Company is hereby required to submit to this office within thirty days from the receipt 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.