

Enclosure 1

NOTICE OF VIOLATION

BEC Energy  
Pilgrim Station

Docket No. 50-293  
License No. DPR-35

During an NRC inspection conducted from July 13, 1998, through July 15, 1998, 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:

10 CFR 50, Appendix B, Criterion III, "Design Control," requires that "... measures shall be established to assure that applicable regulatory requirements and design basis for structures, systems, and components are correctly translated into specifications, drawings, and procedures."

Contrary to the above, the licensee did not establish measures to assure regulatory requirements and the design basis of the control room high efficiency air filtration system (CRHEAFS) were correctly translated into specifications, drawings, and procedures, as evidenced by the following examples:

1. Supports for the ventilation ducts of the safety-related subsystem of the CRHEAFS were attached to the non-safety related subsystem, thereby adversely affecting the seismic category I qualification.
2. The CRHEAFS system design was not able to withstand an assumed single failure of damper AO-N-1, in that its failure could render both CRHEAFS trains inoperable. This is contrary to FSAR design requirements.
3. The control room habitability analysis (as documented in the licensee's February 11, 1981, submittal to the NRC for Item III.D.3.4, Control Room Habitability of NUREG 0737, "Clarification of TMI Action Items,") was inconsistent with operational procedures, in that the analysis did not account for the manual operator actions needed to actuate the system, and the procedures provided for confirmation of alarms, a delay not addressed in the analyses.

This is a Severity Level IV Violation Supplement I.

The NRC has concluded that information regarding the reasons for the above violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance was achieved is already adequately addressed on the docket in LERs 50-293/98-08 and 50-293/98-16 and in NRC Inspection Reports 50-293/98-07. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional

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Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is subject to this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, 20555-0001.

Dated at King of Prussia, PA  
this 7th day of October, 1998