

APPENDIX A  
NOTICE OF VIOLATION

Northeast Utilities Company  
Millstone Nuclear Power Station Unit 3

Docket No. 50-423  
License No. NPR-44

During the inspection conducted between November 19, 1985 and January 6, 1986, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations have been identified:

- A. The Millstone Unit 3 Final Safety Analysis Report, Section 17.2 "Quality Assurance During Operations Phase" incorporates the Northeast Utilities QA Program Topical Report by reference. Appendix D to that report commits to Regulatory Guide 1.29 which endorses ANSI N45.2.2-1973. ANSI N45.2.2 specifies that, in Housekeeping Zone III, a written record of the entry and exit of all personnel and material shall be established and maintained.

Station Administrative Control Procedure ACP-QA-2.02C, "Work Orders", requires that housekeeping zones and cleanliness levels be determined (Section 6.3.1.6) and that specified housekeeping and cleanliness zones be established and maintained (Section 6.5.2.1) using the Material and Personnel Accountability Logs. Figure 7.3 of ACP-QA-2.02C "Unit 3 Category I Housekeeping/Cleanliness Requirements", lists the Emergency Diesels (EDGs) and the Containment Recirculating System (RSS) as Zone III systems.

Work Order M3-85-37851, written for Emergency Diesel Generator (EDG) Inspection, required Zone III Housekeeping/Cleanliness during inspection.

Contrary to the above, while RSS Level Indicator RSS-LE49 was being relocated under Construction Work Permit M3-85-36279 on November 24, 1985 at about 2PM, the inspector found several horizontal steel deck plates covering the Containment Structure Sump (Engineered Safety Features Sump) removed with no personnel or material accountability in effect. The opening left the Containment Recirculation System (RSS) pump suction penetrations uncovered and subject to fouling. There were loose tools and deck plate screws spread over the remaining deck plates and in the sump. In addition, during the EDG "A" inspection in accordance with Work Order M3-85-37851, on December 2, 1985 at about 9:30PM, the inspector found 4 crankcase inspection covers removed from the Emergency Diesel Generator with no material or personnel accountability in effect. There were loose tools, fasteners and pieces of wire spread over the catwalks in close proximity to the open crankcase and oil sump.

This is Severity Level IV Violation (Supplement II).

- B. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be accomplished in accordance with prescribed procedures. The Millstone 3 Final Safety Analysis Report (FSAR), Section 13.5, "Operating and Maintenance Procedures", states: "Plant operations will be performed in accordance with written and approved station and administrative procedures". Further, FSAR

Section 1.8 commits full compliance to Regulatory Guide (RG) 1.33, Revision 2, dated February 1978. Section 3.5.2.a of RG 1.33 Appendix A lists Emergency Power Sources as one of the safety-related PWR systems requiring procedures for startup, operation, and shutdown.

Millstone 3 Operating Procedure OP 3346B, Rev. 0, "Diesel Fuel Oil System," Section 7.5 provides for transfer of fuel oil between storage tanks by overflowing the day tanks. Step 7.5.5 requires that, upon completion of a transfer, all valves be restored to normal configuration in a step-by-step fashion.

Contrary to the above, on November 21, 1985, the licensee failed to restore the valve lineup to normal configuration after transfer of fuel oil between storage tanks. This was followed by a low level alarm on an operating diesel engine day tank, and by a 40 gallon fuel oil spill to the plant yard when a storage tank overflowed.

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

Pursuant to 10 CFR 2.201, the Northeast Nuclear Energy Company is required to submit to this office, within thirty days of the date of the letter transmitting this Notice, a written reply including: (1) the corrective steps 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.

The reply directed by 10 CFR 2.201 and this Notice is not subject to clearance by the Office of Management and Budget under the Paperwork Reduction Act of 1980, Publication 96-511.