

Enclosure 1  
Notice of Violation

Boston Edison Company  
Pilgrim Station

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

During an NRC inspection conducted on November 11, 1997, through January 6, 1998, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions, NUREG-1600, the violations are listed below:

- A. 10 CFR 50 Appendix E, Criterion XVI, Corrective Action, states, in part, that measures shall be established to assure that conditions adverse to quality, such as deficiencies, deviations, and non-conformances are promptly identified and corrected. The measures shall assure that the cause of the condition is determined and corrective actions taken to preclude repetition.

Procedure 1.3.121, "Problem Report Program," revision 3, section 6.6.3 and 6.6.4 require that corrective actions taken and/or required to correct the deficiency shall be identified and corrective actions developed are adequate to prevent recurrence. Step 6.1(1) requires that "Hardware and non-hardware (human performance, administrative controls, procedural deficiencies) related problems shall be documented on a PR. This includes failures, malfunctions, deficiencies, human errors, abnormal occurrences, defective or degraded material or equipment, and non-conformances."

Contrary to the above, BECo did not properly evaluate the cause and implement corrective actions to preclude repetition of the temporary temperature detectors deficiencies from the reactor vessel flange. The temperature elements moved/separated from the reactor vessel flange on three separate occasions (November 27, December 2, and December 7, 1997). This degraded condition resulted in an extra plant cooldown and heatup. In addition, BECo failed to document on a problem report that two of three temporary temperature detectors, installed per temporary modification 97-29, had become disengaged from the reactor vessel flange on November 27, 1997.

This is a severity Level IV Violation (Supplement I)

- B. Pilgrim Technical Specification (TS) 6.8A, Procedures, requires that procedures be implemented for activities covered under Appendix "A" of NRC Regulatory Guide 1.33. Section 9, Procedures For Performing Maintenance, of Appendix "A" requires that maintenance be properly preplanned, and be performed in accordance with written procedures or instructions that are appropriate to the circumstances. Additionally, BECo procedure 1.5.20, Work Control Process, step 7.5, Task Ready Review, specifies that planners and I&C supervisors shall ensure that parts are in reserve/withdrawn for the work prior to designating a package as task ready. Step 7.5 also specifies that the work supervisor or his designee will perform a hands-on parts verification for each job.

Contrary to the above on December 20, 1997, a work control planner and I&C supervisor classified a work package to replace an ATWS system electrical relay as task ready when all parts were not available. Additionally, a hands-on parts

verification was not performed prior to the start of work. As a result, a relay of the incorrect voltage rating was installed which overheated and resulted in an unplanned ATWS system LCO maintenance outage.

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 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 at Pilgrim, within 30 days of the date of the letter transmitting this Notice of Violation (Violation). This reply should be clearly marked as "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 or severity level, (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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

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, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Docket Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at King of Prussia, Pennsylvania  
this 6th day of February, 1998