

## NOTICE OF VIOLATION

North Atlantic Energy Service Corporation  
Seabrook Station, Unit 1

Docket No. 50-443  
License No. NPF-86  
EA No. 98-097

During an NRC inspection conducted during the period December 15 through December 18, 1997, and January 20 through January 21, 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 50.59, "Changes, tests and experiments," in part, permits the licensee to make changes to its facility and procedures as described in the safety analysis report and conduct tests or experiments not described in the safety analysis report without prior Commission approval, provided the change does not involve a change in the technical specifications or an Unreviewed Safety Question (USQ). The licensee shall maintain records of changes in the facility and these records must include a written safety evaluation which provides the bases for the determination that the change does not involve a USQ.

UFSAR, section 17.2.12.3, Calibration, states, in part, that primary standards have an accuracy of at least four times the required accuracy of the end use equipment being calibrated.

Contrary to the above, on March 13, 1997, the licensee changed procedures as described in the UFSAR and failed to perform a written safety evaluation to determine that the change did not involve an unreviewed safety question (USQ). Specifically, the licensee changed procedure MA 2.3, "Control and Calibration of Measuring and Test Equipment," Section 4.1.8, which implements UFSAR, Section 17.2.12.3, to modify the requirement for accuracy of the primary standards such that the procedure no longer required that the primary standard have an accuracy of at least four times the required accuracy of the end use equipment being calibrated. No safety evaluation was performed to determine that the deletion of the requirement to compare the accuracy of the primary standard with the end use equipment did not involve a USQ.

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

- B. 10 CFR 50, Appendix B, Criterion XII, "Control of Measuring and Test Equipment," requires measures to be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits.

UFSAR, Section 17.2.12.3, Calibration, states, in part, that primary standards have an accuracy of at least four times the required accuracy of the end use equipment being calibrated. Less accurate standards may be acceptable when the use of such standards and the basis of calibration acceptance is authorized and documented.

Contrary to the above, prior to January 21, 1998, measuring and testing devices were not properly controlled to maintain accuracy within necessary limits. Procedure MA 2.3, section 4.4.2, which implements UFSAR, section 17.2.12.3, did not require authorization and documentation for standards less accurate than 4:1.

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

Pursuant to the provisions of 10 CFR 2.201, North Atlantic Energy Service Corporation 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 1, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "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 a 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 Document 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 20th day of February, 1998.