

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 April 28, 1986 - June 2, 1986, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 50 Appendix B, criterion XVI requires in part that measures be established to assure that conditions adverse to quality are promptly corrected. These measures included the following requirements from the Boston Edison Quality Assurance Manual (BEQAM):
- Section 18.4.5 of the Boston Edison Quality Assurance Manual (BEQAM) requires that Deficiency Reports (DR) be either dispositioned within 90 days from the date of issuance or have a DR extension authorized by the appropriate Vice President.
 - Sections 16.2.6 and 16.2.9 require that a DR identifying conditions reportable to the NRC under 10 CFR 50.72 be classified as a significant DR. Section 18.4.2 of the BEQAM further requires that corrective action for significant DR's be initiated promptly and that a response to the DR's be sent to QA within one week.
 - Section 18.4.6 of the BEQAM requires that a written request for a second response for a disputed DR be forwarded to and approved by the appropriate Vice President.

Contrary to the above, as of May 9, 1986, measures were not established to assure that conditions adverse to quality were promptly corrected. Specifically, licensee DR report 1466 (issued November 8, 1985) identified a condition adverse to quality, i.e., inadequate surveillance testing of the high pressure coolant injection system. However, this condition was not corrected for six months. The following violations of BEQAM requirements contributed to the problem:

- No Vice President extension was requested either before or after DR-1466 exceeded its 90-day completion date.
- The surveillance test problem identified by DR-1466 was subsequently reported to the NRC under the requirements of 10 CFR 50.72. However, the DR was not classified as significant.
- The QA request, dated December 31, 1985, for a second response to DR-1466 was not forwarded to the appropriate Vice President after the initial DR finding was disputed.

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

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- B. Technical Specification 6.8 requires that written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972.
- ANSI N18.7-1972 section 5.3.6 requires that procedures be provided for proper control and periodic calibration of measuring and test equipment.
 - Pilgrim Nuclear Power Station Procedure 1.3.3.6, "Measurement and Test Equipment", states that ready to use (calibrated) measuring and test equipment will be separated from other equipment (rejected) to preclude inadvertent use.

Contrary to the above, the licensee failed to properly control measuring and test equipment, in that, equipment which was overdue for calibration was not separated from calibrated equipment and was used on three occasions. Specifically, on May 23, 1986, Fluke multimeter No. 58600A was used during local leak rate testing, and on March 13 and May 15, 1986, timer-counters No. 134 and 135, respectively, were used to calibrate process radiation monitors.

This is a Severity Level V Violation (Supplement I)

Pursuant to the provision of 10 CFR 2.201, Boston Edison Company is hereby required to submit to this office within twenty days of the date 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.