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 February 1, 1985 - March 4, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

A. Technical Specification Table 4.1.1 requires the following:

1. The average power range monitor (APRM) inoperative scram trips be functionally tested prior to declaring them operable while the reactor is in the startup mode,

2. The APRM high flux scram trips be functionally tested as soon as practicable after entering the run mode if the functional test has not been performed within one week,

3. The APRM downscale scram trips be functionally tested prior to declaring them operable while the reactor is in the run mode, and

4. The main turbine stop valve closure alarm be functionally tested prior to declaring the turbine stop valve closure scram instrumentation operable in the run mode with turbine first stage pressure greater than 305 psig.

Contrary to the above:

1. On December 24, 1984 and January 7, 1985, the APRM inoperative scram trips were not functionally tested prior to declaring them operable while the reactor was in the startup mode. The functional test was eventually performed on January 13, 1985.

2. On December 29, 1984, the APRM high flux scram trips were not tested as soon as practicable after entering the run mode and the last test was not within one week. The functional test was eventually performed on January 4, 1985.

3. On December 29, 1984 and January 9, 1985, the APRM downscale scram trips were not functionally tested prior to declaring them operable while the reactor was in the run mode. The functional test was eventually performed on January 13, 1985.

4. On January 12, 1985, the stop valve closure alarm was not functionally tested prior to declaring the turbine stop valve closure instrumentation operable while the reactor was in the run mode and turbine first stage pressure was greater than 305 psig. On February 9, 1985, the reactor mode was changed, and this requirement no longer applied. The test was performed subsequently.

The above examples constitute a Severity Level IV Violation (Supplement I).

B. Technical Specification 1.0.V and Table 4.2.C require the following:

1. The APRM downscale rod block trips be functionally tested prior to declaring them operable in the run mode,

2. The portion of the rod block logic system which is used in the run mode be functionally tested prior to declaring the rod block logic system operable in the run mode, and

3. The upscale and downscale trips for the rod block monitors be functionally tested and calibrated prior to declaring the monitors operable in the run mode with reactor power greater than 30 percent.

Contrary to the above:

1. On December 29, 1984 and January 9, 1985, the APRM downscale rod block trips were not functionally tested prior to declaring them operable in the run mode. The test was eventually performed on January 13, 1985.

2. On December 29, 1984 and January 9, 1985, the portion of the rod block logic system used in the run mode was not functionally tested prior to declaring the rod block logic system operable in the run mode.

3. On January 10, 1985, the upscale and downscale trips for the rod block monitors were not functionally tested or calibrated prior to declaring the monitors operable in the run mode with reactor power greater than 30 percent. On February 9, 1985, the requirement no longer applied. The test and calibration were performed subsequently.

The above examples constitute a Severity Level IV Violation (Supplement I).

C. 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, and the Boston Edison Company Quality Assurance Manual, Sections 16 (Corrective Action) and 18 (Audits), require measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Nuclear Operations Procedure NOP84A1, Nuclear Operations Surveillance Monitoring Report (dated September 30, 1984), requires the Q.A. Manager to be responsible to assure acceptable resolution of surveillance findings and the Department Managers and Group Leaders to be responsible to implement prompt corrective action. Section 6.2 of this procedure requires 1) the cognizant Group Leader to return the signed original Surveillance Finding Sheet to QA

within five (5) working days and, 2) the matter be referred to the Vice Presidents if a solution acceptable to the QA Manager cannot be obtained within thirty days.

Contrary to the above, on February 6, 1985, conditions adverse to quality were not promptly corrected when identified by the Nuclear Operations Surveillance Monitoring Program. Managers and Group Leaders did not implement prompt corrective action as evidenced by the fact that initial responses (Signed Surveillance Finding Sheets) and corrective actions were routinely overdue. As of February 6, 1985, corrective actions for 29 surveillance findings were late; included were initial responses overdue for up to 221 days and corrective actions overdue for up to 306 days. Examples are listed below:

Finding No.	Description	Initial Response	Corrective Action
84-1.4-2-3	Unapproved standby liquid control tank heater setpoint		276 days overdue
84-1.1-14-1	Improper selection of battery pilot cells	149 days overdue	
84-4.2-1.1	Inadequate emergency diesel sprinkler test		306 days overdue
84-6.1-2-1	No verification of licensed operator education	221 days overdue	

The above examples constitute a Severity Level IV Violation (Supplement I).

D. 10 CFR 50, Appendix B, Criterion VI, Document Control requires that measures be established to control the issuance of procedures to assure that they are used where the activity is performed.

Contrary to the above, on February 14, 1985, measures did not assure that procedures were used where the activity was performed in that procedure 8.7.2.7, Measure Flow and Pressure Drop Across Control Room Environment System, was performed utilizing Revision 4 instead of the correct Revision 5, approved on July 27, 1984.

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

E. Criterion XII of 10 CFR 50 Appendix B, requires that measures be established to assure that measuring and testing devices used in activities affecting quality are properly controlled.

Contrary to the above, on January 19, 1985, measures were not established which assured that measuring and testing devices were properly controlled in that digital multimeter No. I-860C which was past due for calibration was used to check the rod block monitors during rod block monitor

calibrations. In addition, on February 20, 1985, decade box No. IDC 6A and frequency counter No. 134 were past due for calibration but stored with calibrated equipment and available for use.

The above examples constitute 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 thirty 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.