

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 July 8, 1986 - August 4, 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, Corrective Action, states that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Boston Edison Company Quality Assurance Manual, Sections 15 and 16, establishes the corrective action program. In particular, section 15 states that nonconforming materials, parts or components identified during operation are documented and reported via a Failure and Malfunction Report (F&MR). Pilgrim Nuclear Power Station Procedure (PNPS) 1.3.24, Revision 12, Failure and Malfunction Reports, states that a F&MR shall be initiated whenever any abnormal plant condition is identified that has the potential to adversely affect safe operations. The procedure states that the F&MR is used to inform plant management of important plant conditions, insure that initial reviews and safety assessments are made, determine if events are reportable to the NRC, and document that corrective actions are initiated.

Contrary to the above, during 1985, F&MR's were not completed by licensee engineering personnel after they identified deficient station fire barriers. An F&MR was also not promptly initiated on July 2, 1986, after an engineering memo outlining the deficient barriers was sent to the station. As a result the licensee did not promptly review the barrier deficiencies and could not determine in a timely manner whether corrective actions, as required by Section 3.12.F of the Technical Specifications, were initiated in 1985 and 1986. In addition, the deficiencies were not reviewed at the time, for reportability to the NRC.

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

- B. Technical Specification 6.8.A states that written procedures shall be established and implemented that meet or exceed the requirements of section 5.1 of ANSI N18.7-1972.

ANSI N18.7-1972, Administrative Controls for Nuclear Power Plants, Section 5.1 requires that surveillance test procedures be established and followed for tasks in which operations must be performed in a specified sequence. It further states that if documentation of an action is required, the procedure should be present and followed step by step, and necessary data should be recorded as the task is performed.

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Contrary to the above, on the dates indicated below, the following surveillance test procedures were performed and steps implementing verification and independent verification of system response and system restoration were not completed:

1. PNPS Procedure 8.M.2-1.5.8.4, Logic System Functional Test of System "B" Standby Gas Treatment Initiation, Reactor Building Isolation and Outboard Drywell Isolation Valves on July 26, 1986.
2. PNPS Procedure 8.M.2-1.4.1, Revision 12, Main Steam High Temperature Sensors Functional Test, on April 5, 1986, and May 7, 1986.

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 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.