

ENCLOSURE 1

NOTICE OF VIOLATION

Boston Edison Company
Pilgrim Nuclear Power Station

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

During the NRC inspection conducted from July 21 - August 1, 1997, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR 50 Appendix B, Criterion V requires in part that activities affecting quality shall be accomplished in accordance with procedures. Also, Criterion XVI requires in part that measures be established to assure conditions adverse to quality such as deficiencies and nonconformances are corrected.

Contrary to the above, from July 29, 1997 to August 1, 1997 the corrective action procedure measures were not accomplished as noted below:

- (1) Procedure No. 1.3.121, "Problem Report Program," revision 1, dated May 28, 1997, Step 6.6.1 [9] states that "the apparent cause analysis shall be signed by the evaluator and the mentor if the evaluator was not formally trained in HPI methodologies."

For problem report PR97.9220, trip of "B" Residual Heat Removal Pump, the individual performing the root cause analysis was not formally trained in HPI methodology nor was it evident that a mentor assisted in the evaluation.

- (2) Procedure No. 1.3.121, "Problem Report Program" revision 1, dated May 28, 1997, Step 6.7.[5] states that "identified corrective actions are required to be tracked to completion according to Action Items associated with the IADB (Integrated Action Data Base) or according to other corrective action tracking processes determined to be appropriate by the CST (Operations Support Team)."

As of July 29, 1997 the corrective actions identified in the March 17, 1997 Training Department memorandum entitled, "Assessment of Operator Performance During RPV Level Transient and Subsequent Unit Trip Occurring February 15, 1997 (Rev 1)," were not entered into the Integrated Action Data Base for proper implementation and tracking (or other process determined by OST) and as such were not completed.

- (3) Independent Oversight Team Work Instruction IOTWI.001, revision 0, dated July 15, 1996, Section 5.1, states that the IOT Manager will provide a monthly report to the Site Director summarizing the activities that were reviewed, problems that were noted, and any proposed corrective actions that are recommended. Section 7.2 states that a quarterly executive summary shall be provided to the Senior Vice President Nuclear identifying those areas that were reviewed during the previous month, areas for improvement, and recommendations to effect those improvements.

The IOT Manager failed to provide a monthly or quarterly summary of IOT activities reviewed, problems identified, or recommendations to effect improvements in the IOT's December 1996 through January 1997 Monthly Trend Reports.

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 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: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (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.

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. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at King of Prussia, Pennsylvania
this 17th day of September, 1997