## 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 August 3-7, 1987, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 2, Appendix C (Enforcement Policy 1987), the following violation was identified:

10 CFR 50.54 (a)(1), requires each nuclear power plant licensee subject to the Quality Assurance Criteria in 10 CFR 50 Appendix B to implement pursuant to 10 CFR 50.34(h)(6)(ii), the quality assurance program described or referenced in the Safety Analysis Report, including changes to that report.

Boston Edison Company Quality Assurance Manual (BEQAM) Volume II implements the requirements of 10 CFR 50 Appendix B. BEQAM Section 6, Document Control, requires that measures be established to assure that documents affecting quality are reviewed for adequacy and approved for release by authorized personnel.

Contrary to the above on August 6, 1987, it was determined that Plant Design Change (PDC) 86-70, Standby Gas Treatment System Modification, had been reviewed, released and implemented but did not completely specify design verification testing requirements as required by BEQAM, Section 3, Paragraph 3.3.2.8., specifically electrical functional and logic testing requirements.

In addition, Temporary Procedure 87-128, Preoperational Test of Standby Gas Treatment System (SBGTS) Modification Per PDC 80-70 was reviewed, approved and released for performance on July 22, 1987 and contained several errors and did not verify all design aspects of PDC 86-70. Specifically, neither the formal review process of PDC 86-70 nor the formal review of TP87-128 identified the missing testing requirements of the PDC or the failure of the TP to fully verify the SBGTS modified design.

This is a Severity Level IV violation (Supplement I)

Pursuant to the provisions of 10 CFR 2.201, Pilgrim Nuclear Generating Station 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 reasons for the violation if admitted, (2) the corrective steps which have been taken and the results achieved; (3) corrective steps which will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

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