

Enclosure 1

NOTICE OF VIOLATION

Boston Edison Company  
Pilgrim Station

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

As a result of an inspection conducted January 22, 1996 through February 9, 1996, information received on June 17, 1996, and additional inspection conducted during this inspection period (July 29 - September 23, 1996), the following violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy (60 FR 34381; June 30, 1995), the violation is described below:

Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B, states, in part, that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, corrective actions for problems identified since at least April 1995, were not effective in identifying and correcting overall procedural adherence and adequacy problems at Pilgrim. The following specific procedural adherence and adequacy problems were identified:

1. Procedure 2.2.87, Control Rod Drive System, Revision 53, was inadequate by not providing direction to operators moving reactor fuel to verify the correct orientation of the blade guide before control rod insertion. As a result, on April 30, 1995, control rod 18-35 was inserted into the reactor core and physically jammed into a mispositioned blade guide causing blade guide and control rod damage.
2. Procedure 9.13, Control Rod Sequence and Movement Control, Revision 12, Attachment 3 listed control rods to be moved. During the power reduction required on October 6, 1995, operators did not follow the reverse order of the pull sheet as evidenced when control rod 34-23 became mispositioned.
3. Nuclear Operating Procedure NOP 92A1, "Problem Report Program," Step 6.5.3 directs that Severity Level I problem report evaluations be forwarded to NSRAC for their review. However, as of January 1996, the NRC identified that NSRAC had not been forwarded approximately one-third (60) of the Level I evaluations.
4. On July 31, 1996 valve MO-1001-16A ("A" RHR loop heat exchanger bypass) became mispositioned when a reactor operator failed to follow the established RHR procedure when securing torus cooling. The valve was mispositioned for approximately 11 hours.
5. In February 1995, a calibration problem on the "B" scale of the Rockwell Hardness Tester machine was adverse to quality and was not promptly identified or corrected. Quality control inspectors relied on verbal advice from an outside vendor rather than contacting the BECo measurement and test equipment personnel, as specified in the M&TE program, or initiating a problem report in accordance with NOP 92A1, "Problem Report Program". Also, the degradation of a related BECo calibration block has not adequately been addressed to date.

This is a Severity Level IV violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Boston Edison Company is hereby requested 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 Pilgrim. If Boston Edison disagrees with the violation, they should respond to this Notice within 30 days of the date of the letter transmitting this Notice of Violation. If Boston Edison agrees with this violation, they should hold their response until the FPI International review is complete to provide more definitive and comprehensive corrective actions. This response should be submitted no later than January 31, 1997. The response should be clearly marked as "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. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such 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 Docket 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 reduction. 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 30th day of October, 1996