

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 May 20-24, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

Technical Specification 6.8 requires that written procedures and administrative policies be established, implemented and maintained, that meet or exceed the requirements and recommendations of Appendix 'A' of Regulatory Guide 1.33, 1972. This regulatory guide recommends, in part, that procedures for procedure review and approval be prepared. Station approved procedure 1.3.4, "Procedures," requires in Section III.A that approved written procedures be adhered to by all station personnel.

1. Procedure 1.3.4, Revision 27, specifies, in part, in Section C.3, that the Operations Review Committee (ORC) indicate its approval of a procedure to be included in Category Three Group procedures.

Contrary to the above, as of May 23, 1985, two procedures, FP-OP-007-442 and FP-OP-008-442, used to provide guidance for cutting of control rod blades and LPRMs, were not presented to ORC for approval as Category Three Group procedures. As a result, the ORC did not indicate its approval of the procedures for use as Category Three Group procedures.

2. Procedure No. 3.M.1-19, Revision 1, "Spent Fuel Pool Cleaning," specifies in Section IV, that the obtaining of a valid Maintenance Request (MR) is a prerequisite for procedure use.

Contrary to the above, as of May 23, 1985, procedure No. 3.M.1-19 was used to provide general guidance for cutting of control rod blades and LPRMs in the spent fuel pool, but no valid Maintenance Request was in effect.

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

Pursuant to the provisions 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.

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1. Procedure 1.3.4, Revision 27, specifies, in part, in Section C.3, that the Operations Review Committee (ORC) indicate its approval of a procedure to be included in Category Three Group procedures.

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