

SEP 20 1985

Docket No. 50-293
License No. DPR-35
EA 85-104

Boston Edison Company M/C Nuclear
ATTN: Mr. William D. Harrington
Senior Vice President, Nuclear
800 Boylston Street
Boston, Massachusetts 02199

Gentlemen:

SUBJECT: NOTICE OF VIOLATION
(Inspection No. 50-293/85-21)

This refers to the special NRC inspection conducted by the NRC Resident Inspector on July 16-30, 1985, at the Pilgrim Nuclear Power Station, Plymouth, Massachusetts. The inspection report was forwarded to you on August 13, 1985. The inspection was conducted to review the circumstances associated with two violations of NRC requirements, one of which was identified by members of your staff and reported to the NRC. The violations involve: (1) failure to take action to maintain secondary containment integrity in accordance with the technical specifications upon discovery of an inoperable ventilation damper on July 15; and, (2) failure to perform required surveillance testing of certain systems in accordance with the technical specifications after finding an unacceptable water and sediment content in the fuel oil supply of one of the diesel generators on July 23, 1985. On August 27, 1984, we held an enforcement conference with you and members of your staff to discuss the apparent violations, their causes, and your corrective actions.

The NRC is concerned that each of these violations of the technical specifications could have been prevented if the responsible plant personnel, upon discovery of the abnormal condition, had promptly initiated a Failure and Malfunction Report (F&MR) as required by procedure. This report is utilized to inform the operations department of the abnormal condition to ensure a prompt review of the safety significance of the failure or malfunction. Such communication between nonlicensed personnel and the licensed operators regarding abnormal conditions is essential to ensure that actions required by the technical specifications are promptly taken to assure the facility is operated safely. Failure to promptly complete the F&MR constitutes a third violation of NRC requirements.

The NRC is also concerned that although the F&MRs were not completed in each case, licensed operators were informed of the abnormal conditions, either verbally or through the issuance of a maintenance request. However, the operators did not independently pursue a determination of the effect of the ab-

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normal conditions on the ability to adhere to the technical specifications. The licensed operators apparent reliance solely upon the F&MR for notification of abnormal conditions does not exhibit the aggressiveness expected of licensed operators in pursuing resolution of potential problems.

These violations have been classified at Severity Level IV in accordance with the "General Statement of Policy and Procedures for Enforcement Action", 10 CFR 2, Appendix C based on the low safety significance. Nonetheless, we will examine closely your corrective action, and we emphasize that any similar violation in the future may result in additional enforcement action.

You are required to respond to the enclosed Notice and you should follow the instructions specified therein when preparing your response. In your response, you should address the actions taken or planned to ensure that (1) plant staff understands the importance of initiating F&MRs and will properly initiate and implement F&MRs in the future, and (2) licensed operators do not rely solely on F&MRs for notification of abnormal conditions. Your written reply to this letter and the enclosed Notice and the results of future inspections will be considered in determining whether further enforcement action is appropriate.

In accordance with 10 CFR 2.790(a) a copy of this letter and the enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

Original Signed By:

Richard W. Starostecki, Director
Division of Reactor Projects

Enclosure:
Notice of Violation

cc w/encl:

A. V. Morisi, Manager, Nuclear Management Services Department
C. J. Mathis, Station Manager
Joanne Shotwell, Assistant Attorney General
Paul Levy, Chairman, Department of Public Utilities
W. J. Nolan, Chairman, Plymouth Board of Selectmen
Plymouth Civil Defense Director
Senator Edward P. Kirby
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Massachusetts (2)

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SEP 20 1985

bcc w/encl:

Region I Docket Room (with concurrences)

Senior Operations Officer (w/o encl)

Section Chief, DRP

W. Raymond, SRI, Vermont Yankee

T. Shedlosky, SRI, Millstone 1&2

H. Eichenholz, SRI, Yankee

P. Leech, LPM, NRR

D. Holody, RI (2)

J. Axelrad, IE

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for
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