

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 20, 1985 - September 23, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

10 CFR 50 Appendix B, Criterion XVI, "Corrective Actions", requires that conditions adverse to quality be promptly identified and corrected. Procedure No. 1.3.34, "Conduct of Operations", requires in part that the Plant Manager authorize overtime involving safety related activities when work times exceed twenty-four hours in a forty-eight-hour period or seventy-two hours in a seven-day period. The lack of a program to implement overtime authorization requirements for licensed reactor operators who work more than twenty-four hours in a forty-eight-hour period was identified during NRC Inspection No. 50-293/85-01 in January, 1985. In addition, the failure to authorize a licensed reactor operator to work more than seventy-two hours in a seven-day period was identified by the licensee in July, 1985.

Contrary to the above, following NRC inspection no. 50-293/85-01 in January, 1985 and following identification of unauthorized overtime in July 1985, the licensee did not take corrective action to ensure that overtime for licensed reactor operators was subsequently authorized in accordance with the requirements of Procedure No. 1.3.34. Failure to properly authorize licensed reactor operator overtime is a condition adverse to quality. As a result of the lack of licensee corrective action, operators worked unauthorized overtime as follows:

- a. From June 15, 1985 to September 14, 1985, there were 29 instances when licensed reactor operators worked more than twenty-four hours in a forty-eight-hour period without authorization from the Plant Manager. The maximum number of hours worked was 34 hours.
- b. From August 18, 1985 to September 7, 1985, there were six instances when licensed reactor operators worked more than seventy-two hours in a seven-day period without authorization from the Plant Manager. The maximum number of hours worked was 87 hours.

This is a Severity Level IV Violation (Supplement I).

Pursuant to the provision 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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