

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 June 13, 1985 - July 15, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. Technical Specification 6.8 requires in part that procedures be established, implemented and maintained that meet or exceed the requirements of Section 5.1 of ANSI N18.7-1972. Section 5.1 of ANSI N18.7-1972 requires that procedures be instituted for surveillance testing. In addition, Technical Specification 4.9.A.2 requires that pilot cells in the station batteries be tested for specific gravity, voltage, and temperature at a frequency of once-per-week.

Contrary to the above, on June 2, 1985, procedures were not established and maintained for surveillance testing of the station 250 V battery. As a result, pilot cell specific gravity, voltage, and temperature were not tested between May 26, 1985 and June 9, 1985. In addition, portions of surveillance test Procedure No. 8.C.14 for the station batteries were not implemented on the following occasions:

- On June 9 and 23, 1985, battery temperatures above procedural acceptance criteria were logged and accepted without recognizing that acceptance criteria were exceeded, therefore, no followup actions were taken.
- On June 9, 1985, voltage levels for the D17-125V and D10-250V distribution buses were not logged on the procedural check list as required by the procedure.
- On July 9, 1985, the voltage level for the D17-125V distribution bus was incorrectly entered on the procedural check list.
- On July 6 and 13, 1985, battery cells in the 125V (B) and 250V station batteries with the lowest specific gravities were not chosen pilot cells for testing as required by the procedure.

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

- B. Technical Specification 6.8 requires in part that procedures be implemented which meet or exceed the requirements of Appendix "A" of USNRC Regulatory Guide 1.33. Regulatory Guide 1.33 requires that procedures for radiation work permits be instituted. Procedure No. 6.1-022, "Radiation Work Permit", requires in part that both a comprehensive radiation survey frequency and a high radiation area surveillance frequency be specified on work permits. In addition, Technical Specification 6.13 requires that high radiation area surveil-

lance frequencies be entered on radiation work permits, if individuals in high radiation areas are not provided with either a continuously indicating radiation instrument or an integrating, alarming dosimeter.

Contrary to the above, on July 3, 1985, radiation work permits which required periodic radiation surveillance for high radiation areas did not specify high radiation area surveillance frequencies.

This is a Severity Level IV Violation.

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.