

NOTICE OF VIOLATION

Northeast Nuclear Energy Company
Millstone Units 1 and 2

Docket Nos. 50-245 and 50-336
License Nos. DPR-21 and DPR-65

During an NRC inspection conducted on November 12-22, 1996, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995) the violations are listed below.

1. Section 6.8 of the Unit 1 TS requires, in part, that written procedures shall be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33 (RG 1.33), February 1978. Appendix A of the RG 1.33, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors," describes typical procedures for the control of radioactivity, including procedures involving ventilation systems relative to limiting personnel exposure and releases to the environment.

Section 9.4.6 of the UFSAR, "Turbine Building Area Ventilation Differential Pressure," states that the area should be maintained at a negative pressure (about 0.1" of water) to avoid any release of potentially contaminated air through turbine building vents or doors. Section 9.4.8 of the UFSAR, "Steam Tunnel Ventilation System," indicates that differential pressure should be maintained at a negative pressure (about 0.25" of water) to ensure that there will be no inadvertent ground level release. Sections 9.4.4 and 9.4.5 of the UFSAR describe the design basis relative to ventilation air supply, including 10,900 scfm to the Radwaste Building Ventilation and 3,350 cfm to the Radwaste Storage Buildings.

Contrary to the Section 6.8 TS requirements, as of November 22, 1996, the licensee failed to establish and implement procedures to verify that: (1) the design basis relative to air balance affecting the turbine building area ventilation system and the steam tunnel ventilation system was maintained at a negative pressure, as described by the UFSAR ; and (2) the design basis relative to ventilation air supply involving the Radwaste and Radwaste Storage Buildings was maintained as described by the UFSAR.

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

2. Section 6.8 of the Unit 2 TS requires, in part, that written procedures shall be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33 (RG 1.33), February 1978. Appendix A of the RG 1.33, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors," describes typical procedures for the control of radioactivity, including procedures involving ventilation systems relative to limiting personnel exposure and releases to the environment.

Section 9.9.9.4.2 of the FSAR describes tests and inspections for the air cleaning system, High Efficiency Particulate Air Filter (HEPA), of the Main Exhaust System. Section 6.7.4.2 describes that the HEPA filter bank is to be tested, in place, periodically.

Contrary to the Section 6.8 TS requirement, as of November 22, 1996, the licensee had failed to establish and implement procedures sufficient to test the HEPA filter of the Main Exhaust System, in the manner described by the FSAR, since commencement of operations at the facility.

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

Pursuant to the provisions of 10 CFR 2.201, Northeast Nuclear Energy Company is hereby required 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 Director, Special Projects Office, NRR and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the receipt date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other 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 Document 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 3rd day of February 1997.