

**ENCLOSURE 1
NOTICES OF VIOLATION**

Northeast Nuclear Energy Company
Millstone Nuclear Power Station
Units 1, 2, and 3

Docket No.(s): 50-245; 50-336; 50-423
License No.(s): DPR-21; DPR-65; NFP-49

During an NRC inspection conducted on October 26, 1996 through December 31, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Unit 1 Technical Specification 6.8.1, "Procedures," requires that written procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A to Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operations)," dated February 1978. Section 1.a. of Appendix A to RG 1.33 states that administrative procedures should be written to cover security and visitor control activities.

The "Millstone Nuclear Power Station Physical Security Plan," Section 6.1 "Access Control," states entry into the Protected Area is authorized only for specifically approved purposes and only after appropriate searches, identification, and access authorizations are accomplished.

Section 6.4.1.2 "Authorized Individuals," states, in part, that all authorized individuals must have their identification badge with keycard, as well as have their hand geometry confirmed to gain access to the Protected Area.

Contrary to the above, on August 5, 1996, at about 8:00 a.m., an individual working for an administrative contractor gained access to the Protected Area (PA) without having her access authorized or hand geometry confirmed. Specifically, the unauthorized individual, that had not surrender her badge and key card upon termination on July 19, 1996, arrived at the station to report for a new work assignment. A co-worker used her own valid key card and hand geometry to allow the unauthorized individual to enter the PA. The co-worker followed the individual into the PA by keying in a second time. The two individuals worked in the PA until the end of the day shift, about 3:40.

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

- B. Technical Specifications Section 6.2.1 "Onsite and Offsite Organizations," states, in part, that onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant including the Senior Vice President - Millstone Station (Section 6.2.1.b), and Executive Vice President - Nuclear (Section 6.2.1.c).

Contrary to the above, as of October 1, 1996, the onsite and offsite organizations did not include the positions of the Senior Vice President - Millstone Station and the Executive Vice President - Nuclear, for activities affecting the safety of the nuclear power plant. The organizational changes implemented at that time introduced discrepancies between the titles and functions of the new organization, and the organization as described in Technical Specifications Section 6, "Administrative Control."

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

- C. Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained for activities referenced in Appendix A of Regulatory Guide 1.33, "Quality Assurance Program Requirements" (Operation), Revision 2, February 1978 (RG 1.33). Item 8.a. of Appendix A to RG 1.33 recommends, in part, that procedures for control of measuring and test equipment and for surveillance tests, procedures, and calibrations be provided to ensure tools, gauges, instruments, controls, and other measuring and testing devices are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy.

Procedure ES #142, "Thermoluminescent Dosimeter Irradiation," line 2 states, "Place a calibrated ionization chamber which is fully charged (accuracy $\pm 5\%$ traceable to NIST) in one of the designated locations on the source table. This chamber will be used to verify the calculated dose rate after the exposure."

Contrary to the above, the licensee did not use an ionization chamber which had been calibrated (accuracy $\pm 5\%$ traceable to NIST) to verify the calculated dose rate after the exposure of thermoluminescent dosimeters to the source of the Shepherd panoramic irradiator. The ionization chamber which was used (Victoreen Condenser-R Meter) had not been calibrated since 1988 to verify its accuracy as traceable to NIST.

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, Nuclear Reactor Regulation, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the 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 as to 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 redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at King of Prussia, Pennsylvania
this 24th day of February, 1997.