



CONNECTICUT YANKEE ATOMIC POWER COMPANY

BERLIN, CONNECTICUT

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May 24, 1979

CYH 79-156

DOCKET NO. 50-213

U. S. Nuclear Regulatory Commission
Region 1
Office of Inspection and Enforcement
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attn: Mr. E. J. Brunner, Chief
Reactor Operations and Nuclear
Support Branch

Reference: Letter, E. J. Brunner to W. G. Council,
dated May 9, 1979
Inspection 50-213/79-08

Dear Mr. Brunner:

The following explanation concerning the item of non-compliance described in the above reference is submitted to your office pursuant to the provisions of Section 2.201 of the Nuclear Regulatory Commissions "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

Deficiency

Based on the results of an NRC inspection conducted on March 20-23, 1979, it appears that one of your activities was not conducted in full compliance with conditions of your NRC Facility License No. DPR-61 as indicated below. This item is a deficiency.

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Technical Specification 6.8.1 states, in part, "Written procedures and administrative policies shall be established, implemented and maintained..." Procedure QA 1.2-6.4, Temporary Procedure Change, Step 5.1, states, "When a deviation from a procedure is required a temporary procedure change shall be utilized."

Contrary to the above, during the performance of Surveillance Procedure, SUR 5.2-19, Refueling Water Storage Tank Level Calibration, on January 11, 1979, a deviation from the procedure was made in that the low level alarm setpoint was changed from equal to or greater than 230,000 gallons to 227,000 gallons with no procedure change being utilized.

Response

The Refueling Water Storage Tank when operable contains between 230,000 and 250,000 gallons of borated water. The level is continuously monitored and the level indication pneumatically transmitted to the Primary Auxiliary Building Operating Control Panel and to the Control Room Panel. Both high and low level alarm capability is provided by pneumatic/electric mercoid switches. Because of the type of switch used the reset range covered approximately 21,000 gallons. In order to achieve a low level alarm reset at a value less than the tank overflow level it was necessary to set the alarm point at 227,000 gallons.

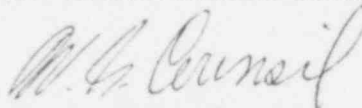
With the calibration procedure calling for a setpoint equal to or greater than 230,000 gallons, a Temporary Procedure Change or a procedure revision should have been initiated to allow the lower setpoint. This item has been discussed with the cognizant department foreman and will be implemented accordingly when applicable.

A new alarm mercoid was installed on May 22, 1979 which has a much smaller reset range and was set to alarm at 230,000 gallons.

Corrective steps have been taken and the activity is now in full compliance with the NRC's requirements.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY



W. G. Council,
Vice-President