

VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET
RUTLAND, VERMONT 05701

B4.5.1
WVY 79-117

October 9, 1979

REPLY TO:
ENGINEERING OFFICE
TURNPIKE ROAD
WESTBORO, MASSACHUSETTS 01581
TELEPHONE 617-366-9011

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Office of Inspection and Enforcement
Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) USNRC Letter to VYNPC, dated September 14, 1979
(Inspection Report 50-271/79-12)

Dear Sir:

Subject: Response to I&E Inspection Report No. 79-12

This letter is written in response to Reference (b) which indicates that certain of our activities were not conducted in full compliance with Nuclear Regulatory requirements. The alleged items of noncompliance were noted during an inspection conducted on August 13-17, 1979, at the Vermont Yankee Nuclear Power Station in Vernon, Vermont. Information is submitted as follows in answer to the alleged infraction and deficiency contained in the enclosure to your letter:

Item A

Technical Specification 6.5.A states in part, "Detailed written procedures involving nuclear safety...shall be prepared and approved. All procedures shall be adhered to."

Procedure O.P. 0101, Reactor and Generation Systems Heatup to Low Power, Revision 7, states in step I.A.15, "Start one reactor feed pump at approximately 350 psig in accordance with R.P. 2172."

Contrary to the above, at 0031 hours on August 13, 1979, during a reactor startup following a maintenance outage, a reactor feed pump was not started until reactor pressure was approximately 480 psig. Failure of the operators to start the reactor feed pump at the prescribed pressure resulted in a reactor scram due to low reactor vessel water level.

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Response

After a management review of the events leading to the reactor scram on August 13, 1979, it has been concluded that the operator erred in failing to notice a decreasing trend of reactor vessel water level and consequently to bringing this condition to the attention of his supervisor.

As a result, we have reemphasized to the operation personnel the importance of maintaining a continuous awareness of vessel level and the need to alert supervisory personnel of existing trends.

Item B

Technical Specification 6.5.A states in part, "Detailed written procedures involving nuclear safety...shall be prepared and approved. All procedures shall be adhered to."

Procedure A.P. 0021, Maintenance Requests, Revision 7, states in the Discussion section, "Maintenance Requests (MR) must be submitted for all corrective maintenance," and states in Procedure Step 1: "The individual who notices a deficiency in plant equipment which requires repair must originate or cause to be generated, a Maintenance Request (MR) using form VYAPF 0021.01 available in the Control Room and entering the appropriate information on the Control Room index. The form must accurately describe the affected equipment and its symptoms."

Contrary to the above, on August 2, 1979, corrective maintenance was performed to repair pipe hanger MS-H-A10 on the HPCI system and no maintenance request is issued.

Response

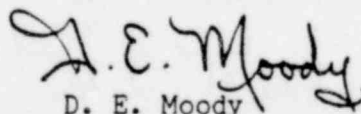
Since MS-H-A10 is a designed seismic restraint for a required safety system, it was conservatively determined at that time, that the repair must be performed within 72 hours to allow continued reactor operation. Procedures were therefore developed to provide the necessary controls and quality to perform the necessary repair. These procedures were both management and PORC approved prior to start of work.

Subsequent to IE Inspection 79-12, a Maintenance Request has been generated (MR-79-727) and completed in accordance with A.P. 0021, Maintenance Requests. The personnel involved have been reinstructed to the requirements of A.P. 0021 and it was further emphasized not to loose sight of procedural requirements regardless of the scope of any project.

We trust this information will be satisfactory. Should additional information be required, please feel free to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


D. E. Moody
Manager of Operations

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