

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

Region I

Report No. 78-29
Docket No. 50-271
License No. DPR-28 Priority -- Category C

Licensee: Vermont Yankee Nuclear Power Corporation
20 Turnpike Road
Westborough, Massachusetts 01581

Facility Name: Vermont Yankee

Inspection at: Vernon, Vermont

Inspection conducted: December 12-15, 1978

Inspectors: W. H. Baunack 1/4/79
W. H. Baunack, Reactor Inspector date signed

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Approved by: H. B. Kister 1/5/79
H. B. Kister, Chief, Nuclear Support Section date signed
No. 2, RO&NS Branch

Inspection Summary:

Inspection on December 12-15, 1978 (Report No. 50-271/78-29)

Areas Inspected: Routine, unannounced inspection by a regional based inspector of licensee action on previous inspection findings; administrative controls for facility procedures; technical content of facility procedures; review of facility procedures; review of night orders and department instructions; procedure changes resulting from Technical Specification Amendments; onsite licensee event followup; and a facility tour. The inspection involved 26 inspector-hours onsite by one regional based inspector.

Results: Of the eight areas inspected, no items of noncompliance were found in seven areas; two apparent items of noncompliance were found in one area (Infraction-failure to provide adequate procedures, Paragraph 8; and Deficiency-failure to make a prompt report of an occurrence, Paragraph 8).

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DETAILS

1. Persons Contacted

- * Mr. D. Abely, Technical Assistant
- * Mr. F. Burger, Technical Assistant-QA
- * Mr. R. Burke, Engineering Support Supervisor
- * Mr. J. Cade, Engineering Assistant
- * Mr. W. Conway, Plant Superintendent
- * Mr. A. Diaz, I&C Supervisor
- * Mr. R. Donald, Technical Assistant-QA
- Mr. P. Donnelly, Technical Assistant I&C
- Mr. D. Girroir, Engineering Assistant
- Mr. M. Lyster, Shift Supervisor
- * Mr. W. Murphy, Assistant Plant Superintendent
- Mr. D. Reid, Lead Technical Assistant
- * Mr. R. Sokja, Operations Supervisor
- * Mr. G. Weyman, Chemistry and H.. . Supervisor

The inspector also interviewed other licensee employees, including members of the technical and engineering staff and reactor operations personnel.

* denotes those present at the exit interview.

2. Licensee Action on Previous Inspection Findings

(Closed) Unresolved item (271/77-19-16): A procedure change has been made to AP-201 which requires that a check be made of calibrated test equipment on return from decontamination to insure that the calibration sticker is attached or a replacement attached as necessary.

(Closed) Unresolved Item (271/77-23-02): Completed Plant Alteration Forms 78-11, stack gas isolation system electrical modification, and 78-09, stack gas isolation system mechanical modification were verified to have been completed July 13, 1978 and July 22, 1978. Also, OP 4390 AOG Trip System Logic Functional/Calibration procedure was reviewed to verify inclusion of a check of solenoid valve SE-107-3.

(Closed) Noncompliance (271/77-28-02): Documentation was reviewed verifying that training has been provided to appropriate personnel relative to their responsibilities for insuring the proper documentation of activities affecting VY's Quality Assurance Program.

3. Administrative Controls for Facility Procedures

The inspector performed an audit of the licensee's administrative controls by conducting a sampling review of below listed Administrative procedures with respect to the requirements of the Technical Specifications, Section 5, "Administrative Controls," ANSI N18.7, "Administrative Controls for Nuclear Power Plants," and Regulatory Guide 1.33, "Quality Assurance Program Requirements."

- AP 0001, Plant Procedures, Revision 4, May 8, 1978.
- AP 0002, Department Instructions, Revision 4, May 25, 1978.
- AP 0013, Plant Record Retention, Revision 7, October 2, 1978.
- AP 0154, Control Room Night Order Book, Revision 4, December 6, 1977.

No items of noncompliance were identified.

4. Technical Content of Facility Procedures

Facility procedures were reviewed on a sampling basis using FSAR System Descriptions, Piping and Instrument Diagrams and Technical Specifications, where necessary, to verify that procedures were sufficiently detailed to control the operation or evolution described within Technical Specification Requirements. The procedures reviewed with respect to this area are marked by asterisk (*) in the next paragraph (Paragraph 5, Review of Facility Procedures).

No items of noncompliance were identified.

5. Review of Facility Procedures

- a. The inspector reviewed facility procedures on a sampling basis to verify the following:

- Procedures, and any changes, were reviewed and approved in accordance with the requirements of the Technical Specifications and the licensee's administrative controls.
 - The overall procedure format and content were in conformance with the requirements of ANSI N18.7-1976, "Administrative Controls for Nuclear Power Plants."
 - Checklists, where applicable, were compatible with the step-wise instructions in the procedures.
 - Appropriate Technical Specification Limitations had been included in the procedures.
 - Temporary changes were made in conformance with Technical Specification requirements.
- b. The following procedures were reviewed.
- (1) Operating Procedures
 - *-- OP 3100, Reactor Scram, Revision 7, July 26, 1978.
 - OP 0102, Power Operation (Maneuvering at Power), Revision 8, June 6, 1978.
 - (2) System Operating Procedures
 - OP 2110, Reactor Recirc System, Revision 7, October 12, 1978.
 - *-- OP 2121, Reactor Core Isolation Cooling System, Revision 9, July 26, 1978.
 - RP 2182, Reactor Building Closed Cooling Water (RNCCW), Revision 7, June 30, 1978.
 - *-- OP 2113, Main and Auxiliary Steam, Revision 5, April 28, 1977.
 - *-- OP 2117, Standby Gas Treatment, Revision 5, May 8, 1978.

- RP 2172, Feedwater System, Revision 6, September 26, 1977.
- OP 2142, 4KV Electrical System, Revision 4, March 4, 1977.
- OP 2134, Reactor Protection System, Revision 3, October 12, 1978.

(3) Alarm Response Procedures

- A2 8-1, SG1S Train A Humidity Hi.
- A2 9-4, CCW Eff Rad Hi.
- A4 C-2, RCIC Pump Suct Pr Hi.
- *-- A8 2-3, Mn Stm Ln Iso Vlv Clos.
- A8 4-5, Scram Pilot Hdr Pr Hi/Lo.
- *-- A7 3-7, Drywell Press Hi.

(4) Emergency Procedures

- OP 3103, Loss of Normal Power Emergency Procedure, Revision 5, December 6, 1977.
- *-- OP 3117, Containment High Pressure, Revision 5, July 26, 1978.
- OP 3113, Loss of Service Water Emergency Procedure, Revision 1, April 28, 1977.
- *-- OP 3121, Fuel Element Failure Emergency Procedure, Revision 6, July 26, 1978.
- *-- OP 3104, Main Turbine Pressure Regulator Malfunction Emergency Procedure, Revision 1, October 4, 1977.
- OP 3020, Fire Brigade and Fire Fighting Procedure, Revision 7, November 7, 1978.

(5) Maintenance Procedures

- *-- OP 5203, Shock Suppressors, Revision 3, December 14, 1977.
- OP 5212, Safety System Electrical Equipment, Revision 0, September 9, 1977.
- OP 5220, Limitorque Operator Inspection, Revision 3, August 12, 1977.
- *-- OP 5310, Repair of Safety Related Instrumentation and Components, Revision 0, August 3, 1977.
- RP 5322, Recirculation Pump MG Bailey Positioner Maintenance, Revision 1, May 25, 1978.

(6) Administrative Procedures

In addition to those procedures identified in Detail 3 above, the following procedures were reviewed:

- AP 0020, Lifted Lead/Installed Jumper Request Procedure, Revision 3, September 11, 1978.
- OP 3140, Alarm Response, Revision 3, April 25, 1978.

c. During the review of the above procedures, the following items were identified.

- Regulatory Guide 1.33, Appendix A, lists typical safety-related activities which should be covered by written procedures. Among the activities listed is, Loss of Containment Integrity. No procedure covering this activity appears to have been prepared.

The licensee will review this matter. If existing procedures are found not to provide adequate coverage in this area, a new procedure will be prepared to provide the necessary coverage. This item is unresolved pending completion of action by the licensee as stated above (271/78-29-01).

- Operating Procedure OP 2110, Reactor Recirculation System does not include the requirements of Technical Specification 3.6.J.

The licensee stated the requirements of Technical Specification 3.6.J would be included in the procedure. This item will be reviewed during a future inspection (271/78-29-02).

6. Review of Night Orders and Departmental Instructions

The inspector reviewed Night Orders and selected Departmental Instructions in effect to determine compatibility with facility procedures and Technical Specification requirements.

No items of noncompliance were identified.

7. Procedure Charges Resulting from Technical Specification Amendments

The inspector reviewed License Amendments 42 through 48, and verified that applicable procedures were revised as necessary to reflect the changes to the Technical Specifications.

No items of noncompliance were identified.

8. Onsite Licensee Event Followup

The inspector reviewed circumstances associated with the occurrence described in Licensee Event Report 78-27/3L, High Main Steam Line Flow Switches inoperable. Discussions with personnel, review of documentation, and physical observation of the instrument rack involved verified the event occurred as described by the licensee.

Factors which appeared to have contributed to the cause of the occurrence are:

- Inadequate control over the placement of valve identification tags. No documentation was available which identified the controls provided during a valve tagging program previously conducted.

- Valve checkoffs associated with the proper valve lineup for the High Main Steam Line Flow Switches were incomplete in that certain valves located on the instrument rack containing the flow switches were omitted from the valve checkoff lists.

The failure to provide adequate procedures is contrary to the requirements of Technical Specification 6.5, Plant Operating Procedures and is considered to be an item of noncompliance at the Infrac-tion Level (271/78-29-03).

Additionally, the review of the circumstances associated with the event indicate the report should have been submitted in accordance with Technical Specification 6.7.B.1, Prompt Notification with Written Followup instead of Technical Specification 6.7.B.2 Thirty Day Written Reports. This failure to properly report the occurrence is considered to be an item of noncompliance at the Deficiency Level (271/78-29-04).

9. Facility Tour

On several occasions during the inspection, tours of the facility were conducted of the Auxiliary Building and the Reactor Building. During the tours, the inspector discussed plant operations and observed housekeeping, radiation control measures, monitoring instrumentation and controls for Technical Specification compliance. In addition, the inspector observed control room operations on both day and evening shifts for control room manning, shift turn-overs and facility operation in accordance with Administrative and Technical Specification requirements.

10. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable, an item of non-compliance or a deviation. An unresolved item disclosed during the inspection is discussed in Paragraph 5.c.

11. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on December 15, 1978. The inspector summarized the scope and findings of the inspection. A subsequent discussion on the inspection findings occurred in a telephone conversation between Mr. Conway and the inspector on December 19, 1978.