

ANKEE ATOMIG POWER COMPANY •

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B.4.1.1

WMY 79-35

April 20, 1979

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

Attention: Office of Inspection and Enforcement Mr. Boyce H. Grier, Director

References: (a) License No. DPR-36 (Docket No. 50-309) (b) I & E letter to MYAPC dated March 29, 1979 I & E Inspection Report No. 79-02

Dear Sir:

Subject: Response to Inspection Report No. 79-02

In reply to Reference (b), the Maine Yankee Atomic Power Company hereby submits the following information:

Apparent Item of Noncompliance:

"Technical Specification 5.8.1 states, in part, 'Written procedures shall be established, implemented and maintained covering. . . surveillance and test activities of safety related equipment.' Administrative procedures; 0-06-1, Procedure Preparation, Classification and Format; 0-06-2, Procedure Review, Approval and Distribution; and 0-10-2; Surveillance Tests and Records, which implement the requirements of ANSI N18.7 have been prepared to, among other things, administratively control the performance of surveillance activities.

"Contrary to the above, surveillance test records reviewed March 6-9, 1979, revealed the following examples in which administratively required actions were not being performed.

- Surveillance record sheets were not being prepared for the daily reactor coolant system leakage evaluations.
- (2) The master surveillance schedule was not being maintained.
- (3) Documentation associated with several completed surveillance

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tests did not verify equipment acceptability.

- (4) Acceptance criteria has not been established for cardox storage tank level and pressure, and the boric acid tank concentration.
- (5) The accuracy of the test instrument used in the performance of a fire pump capacity test was not verifiable.
- (6) A diesel fire pump quarterly surveillance test for viscosity, water content and sediment was performed using an unapproved procedure.
- (7) Surveillances associated with diesel fire pump testing failed to document the auto-start of the engine required by Technical Specification 4.12.B.5.3.b, each refueling interval."

Reply:

In a recent meeting of the Plant Operations Review Committee, the Plant Manager reviewed the item of non-compliance cited in the referenced IE Inspection Report, relative to apparent inadequacies in the implementation of administrative controls concerning the performance of surveillance activities. He emphasized the importance of strict adherence to the present controls and procedures.

Department Heads have been directed to review the applicable administrative procedures in conjunction with a review of all safety related surveillance procedures to assure no discrepancies exist. The Plant Manager stressed that if present controls or procedures are not possible to implement, or if a change is desired to reflect our present policies and practices, methods are available through the normal approval routing to make these changes. He re-emphasized that Maine Yankee must operate in a manner that reflects what our administrative controls specify.

The review of these procedures is presently underway and is expected to be completed within 90 days.

We trust this information will be acceptable to you; however, should you have any questions, please contact us.

Very truly yours,

A.E. Morey

MAINE YANKEE ATOMIC POWER COMPANY

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D. E. Moody Manager of Operations