

# VERMONT YANKEE NUCLEAR POWER CORPORATION

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RUTLAND, VERMONT 05701

B.4.1.1  
WVY 80-67

April 29, 1980

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, Pennsylvania 19406

Attention: Office of Inspection and Enforcement  
Mr. George H. Smith, Chief  
Fuel Facility and Materials Safety Branch

References: (a) License No. DPR-28 (Docket No. 50-271)  
(b) USNRC Letter to VYNPC, dated April 9, 1980 (Inspection Report 50-271/79-14)

Dear Sir:

Subject: Response to I&E Inspection Report No. 79-14

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 October 1-4, 1979 at the Vermont Yankee Nuclear Power Station in Vernon, Vermont. Information is submitted as follows in answer to the alleged infractions contained in the enclosure to your letter:

## Item A

Technical Specification 6.5.A states, "Detailed written procedures... shall be prepared and approved. All procedures shall be adhered to."

Technical Specification 6.5.B requires, in part, that "radiation control standards and procedures shall be prepared, approved and maintained...". Procedure AP 0502 requires that standard radiation work permits (RWP) be used for nonroutine work in the radiation control area (RCA) and that pertinent results of radiological surveys be entered on the RWP.

Contrary to the above requirement, a nonroutine task, hydrolasing the reactor vessel, was performed under a routine RWP which did not indicate radiological data pertinent to the task. The RWP indicated contamination levels of 3000-5000 dpm/100 cm<sup>2</sup> and radiation levels of 10-35 mr/hr when licensee surveys indicated contamination levels in excess of 1,000,000 dpm/100 cm<sup>2</sup> and radiation levels in excess of 3,000 mr/hr.

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Response

A job specific RWP was issued immediately for the vessel hydrolazing job when the inspector pointed out the violation. Personnel were subsequently instructed in the proper use of the RWP procedure. Full compliance has been achieved and no further action is deemed necessary.

Item B

10 CFR 20.201(b) requires each licensee to make or cause to be made such surveys as may be necessary to comply with the regulatory requirements specified in 10 CFR Part 20.

Contrary to the above requirement, surveys adequate to assure compliance with 10 CFR 20.101(a) were not performed in the reactor vessel on October 2, 1979. No measurements of beta radiation were made prior to hydrolazing although subsequent measurements indicated beta exposures of 1.75 Rad/hr on unhydrolased areas.

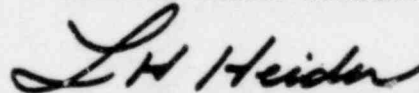
Response

A beta survey was performed and levels of beta radiation of 1.75 Rad/hr were found. Personnel working in the reactor vessel had been properly protected through the use of protective clothing so no significant beta exposure was received by any personnel. Personnel have been instructed in the importance of performing proper radiation surveys. Full compliance has been achieved and no further action is deemed necessary.

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



L. H. Heider  
Vice President

RJW/sec