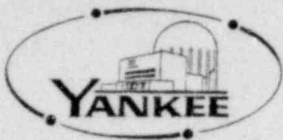


YANKEE ATOMIC ELECTRIC COMPANY

B.4.1.1
WYR 80-69



20 Turnpike Road Westborough, Massachusetts 01581

June 20, 1980

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-3 (Docket No. 50-29)
(b) I&E Letter to YAEC dated May 28, 1980,
I&E Inspection Report 50-29/80-02
(c) YAEC Letter to I&E dated February 15, 1980,
Licensee Event Report 50-29/80-08/01T-0

Dear Sir:

Subject: Response to I&E Inspection 50-29/80-02

Reference is made to I&E Inspection No. 50-29/80-02 which was conducted by your Mr. T. Foley from January 28, 1980 to February 5, 1980 at the Yankee Nuclear Power Station (Yankee Rowe) in Rowe, Massachusetts. The report written subsequent to this inspection identified two items which the inspector felt were not conducted in full compliance with NRC requirements.

In accordance with the requirements of Section 2.201 of the NRC's "Rules and Practices" Part 2, Title 10 Code of Federal Regulations, we are submitting the following action taken on these items.

Item 1:

Technical Specification 3.5.1 states, in part, that, "The low pressure safety injection accumulator shall be operable..."

Yankee Atomic Electric Company Operational Quality Assurance Program (YOQAP-I-A), Revision 8, Section II.C states, in part: "Establishment of an effective Operational Quality Assurance Program is assured through consideration of and conformance, where applicable, with the below listed Federal documents; and ANSI standards.... 2. ANSI N16.7-1976,

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Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants...." ANSI N18.7-1976, Section 5.2.19.3, Tests Associated with Plant Maintenance, Modification or Procedure Changes, states: "Tests shall be performed following plant modifications or significant changes in operating procedures to confirm that the modification or changes reasonably produce expected results and that the change does not reduce safety of operations."

Contrary to the above, during the period from November 4, 1979, to January 19, 1980, the low pressure Safety Injection Accumulator was not operable, as a direct result of inadequate testing following control system modification.

1. Corrective steps taken and results achieved:

The personnel responsible for developing the verification test were reminded of the requirements of proper functional testing of systems after changes have been made to those systems.

The circuit wiring was verified, corrected, and the time delay relays and initiating circuitry operationally verified by means of a functional test.

2. Corrective steps which will be taken to avoid further items of Non-Compliance of this nature:

Plant Operations Procedure OP-4630, "Accumulator Time Delay Actuation Verification," has been updated to include precautions regarding the polarity sensitive nature of the time delay relays.

The events regarding this incident were discussed in a Plant Operations Review Committee Meeting.

A Manager of Operations Directive will be issued to reinforce the requirements of proper testing after plant modifications or significant changes in operating procedures to confirm that the modification or changes reasonably produce expected results and that the change does not reduce safety of operations.

3. Date of full compliance was achieved:

Compliance with Item 1 above was achieved on February 3, 1980. Full compliance is expected by July 15, 1980.

In Addition:

The highest levels of Yankee Atomic Electric Company management were aware and cognizant of this event soon after the situation was identified. The review by our management re-emphasized the significance of this matter to the responsible personnel.

Item 2:

Technical Specification 6.8.1 states, in part, that, "Written procedures shall be established, implemented, and maintained..."

"Yankee Atomic Electric Company In-Plant Tagging Procedures and Local Control Rules," Step 8.7, states, "Active Switching/Tagging Orders, orders that pertain to equipment that is currently switched or tagged out of service, will be kept in the active section of the switching/tagging log book in the Control Room." Appendix "A", Part B, "Instructions for Completing Switching/Tagging Order Forms," Item "I", Tagging Checked By: states, "Record the name of the person(s) that verify that the tagging has been implemented correctly." Item "M", Reported Clear By: states, in part, "Record the name of the person that has reported clear of the tags...before the tags can be removed."

AP-0018, Revision 7, "Bypass of Safety Function and Jumper Control," Step 8, states, "The Duty Shift Supervisor shall review APF-0018.2 and sign item 7 of APF-0018.2" Step 9 states, "The Duty Shift Supervisor shall then insert the request into the closed out section of the Bypass of Safety Function and Jumper Control Log Book and update the master index, APF-0018.1."

Contrary to the above, procedures were not followed in that:

- a. On Switching and Tagging Orders 800110, 800040, and 790129, the name of the person(s) that verified that tagging has been implemented correctly and the name(s) of the person(s) who reported clear the tags, were not recorded and the tags were removed.
- b. On Switching and Tagging Orders 800027, 800009, and 800110, the names of the person(s) that verified that tagging has been implemented correctly were not recorded as required by AP-0017 Appendix A, Part B, Item I, and the tags were removed.
- c. Jumper Control Request Form (APF-0018.2) Numbers 80-31, 80-32, and 80-44 were listed in the master index as active and the forms were located in the closed out section of the log book.
- d. Jumper Control Request Form (APF-0018.2) Number 80-35 was found in the inactive section and item 7 had not been signed by the Shift Supervisor as required.

1. Corrective Steps taken and results achieved:

The personnel responsible for the improper record keeping were reminded of their responsibilities.

To ensure that the responsible personnel are properly maintaining the switching and tagging log and the bypass of safety function and jumper control request log, a supervisor from the Operations Department has been performing audits of the subject record keeping practices. These audits were initially conducted nearly every working day for a two-week period. Since the audits indicated improvement in the subject record keeping practices, the audit frequency has been reduced to random spot checks. These audits are documented in the Operation Department Supervisors Work Log.

2. Corrective Steps which will be taken to avoid further items of Non-compliances of this nature:

Administrative Procedure, AP-2005, "Operations Department Surveillance Schedule" will be revised to require a weekly surveillance of the switching and tagging log and of the bypass of safety function and jumper control request log to ensure that the subject records are being properly maintained.

3. Date of full compliance was achieved:

The status of the specific records which were identified to be in non-compliance was immediately verified and the records were properly completed at that time. Therefore, compliance with Item 1 above was achieved very shortly after the finding was identified. Full compliance is expected by August 1, 1980.

IN ADDITION:

We believe that the present management controls in regard to Item 2 of the Notice of Violation is effective. In reviewing the practices involved in switching and tagging, and bypassing and jumpering safety functions and controls, we feel that the physical aspects involved are being properly performed. We believe that the item on non-compliance is strictly associated with record keeping. The surveillance, which will be performed by the personnel responsible for the implementation of the switching and tagging orders and the bypass of safety functions and jumper control requests.

The performance of the surveillance by the responsible personnel will provide reinforcement of the record keeping requirements of the two subject logs and maintain them in accordance with approved procedures.

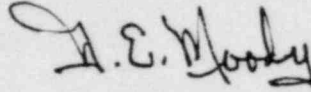
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We trust this information is satisfactory; however should you have any questions, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

A handwritten signature in cursive script, appearing to read "D. E. Moody".

D. E. Moody
Manager of Operations

BLD/sec