

PIEDMONT NUCLEAR POWER STATION
RFD #1 ROCKY HILL ROAD
PLYMOUTH, MASSACHUSETTS 02360

August 1, 1980

BECo Ltr. #80-165

Recd 8/20/80

Mr. Victor Stello, Jr.
Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

License No. DPR-35
Docket No. 50-293

Subject: Response to Letter of Notification Dated July 8, 1980

References:

- A. Letter V. Stello to J. Alukonis dated July 8, 1980
- B. Letter V. Stello to G. C. Andognini dated July 8, 1980

Dear Sir:

This letter is in response to the Notice of Violation dated July 8, 1980 which states that I was not in full compliance with my Senior Operator License (No. SOP-1585-4) in that I initiated refueling activities without verifying secondary containment and without verifying conformance with the requirements of PNPS Procedure 4.3.

As the Senior Licensed Operator I was directing the activities of licensed operators on the refueling floor on March 8, 1980. I would like to provide you with some insight as to the circumstances which I believe caused this item of noncompliance and to inform you of the actions I have taken to prevent recurrence of a similar noncompliance.

During the evening of March 7, 1980 (1600 to 2400 hrs) as Refueling Floor Supervisor, I had supervised the unlatching of the last control rod to be removed from the reactor vessel during the outage. As this control rod unlatching completed all of the scheduled in-vessel work, I returned to the main control room to plan my work for the next shift (0000 to 0800 hrs). While in the control room I performed a routine evaluation of the availability of the systems required for fuel handling. I noted that both trains of the Standby Gas Treatment System were operable. I also was aware that the auto close feature of the emergency diesel generator had been temporarily modified to preclude a possibility of their closing on the bus out of phase with the 23 kv lines and that the control room personnel were cognizant of this condition and had been instructed of all actions required by them, if an auto start of the diesel generators occurred.

Nothing I learned during either my visual inspection or my discussions with the control room personnel gave me reason to suspect that secondary containment integrity was other than intact as previously demonstrated during the successful performance of the leak rate test in January 1980.

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The Chief Operating Engineer's instruction log specified that two fuel elements were to be reoriented in the spent fuel pool when the work schedule would permit it. As I had completed all other scheduled refuel floor activities, I returned to the refuel floor and supervised the reorientation of the two fuel bundles within the spent fuel pool as specified on MBA Transfer Form #828. Procedure 4.3 "Fuel Handling" was not utilized during this maneuver as it did not include a checklist applicable solely to fuel movement within the spent fuel pool. Upon completion of the fuel movement I notified the control room to enable them to update the status of the fuel tag boards maintained in the control room. I logged the fuel movement in the Refueling Floor Supervisor's Log when I returned to the control room, prior to completion of my shift.

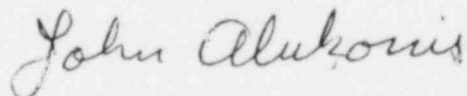
The ORC's met during the afternoon on March 8, 1980 and determined that the fuel movement which had been made under my supervision had in fact been made without secondary containment integrity intact and I was subsequently made aware of their determination.

During the days following the incident, I participated in meetings with members of station management to determine the events which led to the occurrence of the incident. I provided direct input into the development of corrective actions, both immediate and long term to preclude a recurrence of the event. I made suggestions to station management concerning ways to revise station procedures and checklists utilized during fuel handling. I was instrumental in developing the training meetings given to all licensed operators prior to the recommencement of fuel handling to assure that myself and the other licensed personnel were aware of the situations and the corrective actions taken in response. I have assisted in developing training sessions to be implemented during the next scheduled training program in the fall and immediately prior to the next refueling outage.

Please note that Revision 16 to Procedure 4.3 "Fuel Handling" was in effect on March 8, 1980 and that this revision did not require convening ORC for their review of plant conditions and for their approval to begin fuel movement. This requirement was added to Procedure 4.3, Revision 17, on March 20, 1980 as immediate corrective action in response to the subject event. Therefore I at no time violated the requirements of Procedure 4.3

I wish to emphasize that, at no time, did I willfully disregard the commissions regulations or deliberately violate any applicable requirements or procedures.

Very truly yours,



John Alukonis

cc: P. F. Collins, Chief, OLB;NRR