

New Hampshire Yankee

DCS
Ted C. Feigenbaum
Senior Vice President and
Chief Operating Officer

NYN-89161

December 7, 1989

Director, Office of Enforcement
United States Nuclear Regulatory Commission
Washington, DC 20555

- References:
- (a) Facility Operating License NPF-67, Docket No. 50-443
 - (b) USNRC Letter dated August 17, 1989, "NRC Region I Augmented Inspection Team (AIT) Inspection (50-443/89-82) of the Natural Circulation Test at Seabrook Station, Unit 1" W. T. Russell to E. A. Brown
 - (c) USNRC Letter dated October 25, 1989, "Notice of Violation and Proposed Imposition of Civil Penalty \$50,000 (NRC Inspection Report No. 50-443/89-82)" W. T. Russell to E. A. Brown
 - (d) NHY Letter NYN-891335 dated October 31, 1989, "New Hampshire Yankee Corrective Action Plan," T. C. Feigenbaum to W. T. Russell
 - (e) NHY Letter NYN-89148 dated November 17, 1989, "Reply to a Notice of Violation," T. C. Feigenbaum to Director, Office of Enforcement

Subject: Erratum to Reply to a Notice of Violation

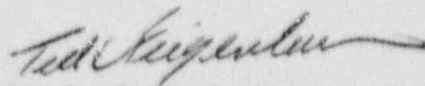
Gentlemen:

New Hampshire Yankee has determined that one line of type is missing from page 6 of Enclosure 1 to the NHY Reply to a Notice of Violation as forwarded by Reference (e). A corrected page is provided as Enclosure 1 to this letter. New Hampshire Yankee apologizes for any inconvenience caused by this error.

Should you have any questions concerning our response, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 474-9521, extension 3772.

Very truly yours,

8912130422 891207
FDR ADOCK 05000443
Q PIC


Ted C. Feigenbaum

Enclosures

Director, Office of Enforcement
United States Nuclear Regulatory Commission

December 7, 1989
Page 2

cc: Mr. William T. Russell
Regional Administrator
United States Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Mr. Victor Nerses, Project Manager
Project Directorate J-3
United States Nuclear Regulatory Commission
Division of Reactor Projects
Washington, DC 20555

Mr. Antone C. Cerne
NRC Senior Resident Inspector
P.O. Box 1149
Seabrook, NH 03874

Document Control Desk
United States Nuclear Regulatory Commission
Washington, DC 20555

New Hampshire Yankee
December 7, 1989

ENCLOSURE 1 to NYN-89161

ERRATUM TO REPLY TO A NOTICE OF VIOLATION

Violation B.1 Response

The failure of Startup Test Department management personnel to ensure that the reactor was promptly tripped was due to an inadequacy in the assignment of personnel responsibilities and requirements as defined in the Startup Test Program Description. When the Test Director was aware that the Unit Shift Supervisor knew that the trip criterion had been exceeded, he withdrew from further interaction in order to allow the licensed operators to take the appropriate actions to control plant parameters. The Startup personnel on shift and in the Control Room should have taken prompt action to correct the condition adverse to quality by ensuring that the Operations personnel were aware of the requirement to trip the reactor.

Corrective Action

The Startup Test Program Description has been enhanced and revised to become the Power Ascension Test Program (PATP). The PATP includes requirements for comprehensive pre-shift briefings prior to the test crew assuming the shift to ensure that the crew understands the test criteria, expected plant response and required actions. Additionally, the PATP requires the test procedures to provide additional guidance for terminating the test and exiting the test procedure when equipment malfunctions occur during testing or test limits are exceeded. The PATP has been reviewed by SORC and was issued as procedure SM 8.1 on November 17, 1989.

The PATP test procedures are being revised. The thirteen (13) PATP test procedures, which require test crew training on the simulator, are currently scheduled for SORC review by November 30, 1989. The remaining PATP test procedures, which do not involve significant test crew interaction (such as data taking procedures), are currently scheduled for SORC review by December 31, 1989.

The PATP provides explicit guidance for the PATP and Operations personnel regarding test termination and test interruption. Additionally, the responsibilities of PATP personnel are defined including their responsibility to ensure that the test is conducted according to the procedure. Each test crew will receive training on the PATP and the individual test procedures as discussed in the response to Violation A.2. The training will include the definitions of responsibilities for each of the personnel on the test crew.

Violation B.2 Response

Subsequent to the reactor trip, New Hampshire Yankee management took action to initiate a review of the Natural Circulation Test Procedure and the policies on procedure compliance. However, the NHY management personnel who participated in the 6:00 p.m. conference call with NRC Region I on June 22nd had not completed their analysis of the event and therefore did not yet have sufficient information to completely discuss the procedural non-compliance and the proposed corrective actions. In addition to being unable at that time to discuss specific details on the procedural inadequacies and the corrective actions: