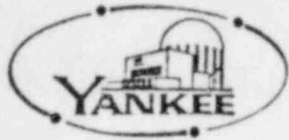


# YANKEE ATOMIC ELECTRIC COMPANY



20 Turnpike Road Westborough, Massachusetts 01581

December 9, 1974

United States Atomic Energy Commission  
Directorate of Regulatory Operations  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Attention: Reactor Operations Branch

Reference: a) License No. DPR-3 (Docket No. 50-29)  
b) USAEC letter dated November 14, 1974

Dear Sir:

This letter is written in response to your letter dated November 14, 1974 which indicates four items that appeared to be in violation of AEC requirements. These items were reported as a result of RO Inspection No. 50-29/74-14 conducted on October 22-25, 1974 at the Yankee Facility in Rowe, Massachusetts.

Information is submitted in answer to the alleged violations contained in the enclosure to your letter as follows:

## Category II Violations

1. Criterion V, Appendix B, 10 CFR 50 states in part:  
"Activities affecting quality shall be...accomplished in accordance with these (prescribed) instructions, procedures, or drawings."

Contrary to the above, maintenance adjustment to Sismic Class I pipe hangers was not conducted with an approved procedure as required by Administrative Procedure AP-0214.

## Response

USAEC Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations), Appendix A, Section I.1 states in fact: "Skills normally possessed by qualified maintenance personnel may not require detailed step-by-step delineation in a procedure."

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It was determined that the subject activity was consistent with the above criteria for performing this work. Instructions were delineated in a memo originating from our Mechanical Engineering Group precluding the necessity of having a step-by-step procedure. This instructional memo was submitted to the plant as a directive from the Manager of Operations. PORC reviewed the SI hanger displacement situation and recommended, in Meeting No. 74-20, that the Yankee Nuclear Services Division evaluate the problem. The above memo was the result of this evaluation.

All work associated with this activity was inspected by Maintenance Department Supervision and by the Quality Control and Audit Coordinator.

Based on the above discussion, we disagree that this item is a violation.

2. Criterion V, Appendix B, 10 CFR 50 states that in part: "...Instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Contrary to the above, modification maintenance to a main coolant check valve was performed without acceptance criteria as required by Administrative Procedure AP-0214 being specified.

#### Response

Maintenance Procedure OP-5200 will be revised to include an acceptance criteria. Additionally, all maintenance procedures shall be reviewed and revised if needed in a timely manner to insure that they contain an appropriate quantitative or qualitative acceptance criteria.

#### Category III Violations

1. Criterion VI, Appendix B, 10 CFR 50 states in part: "...Changes to documents shall be reviewed and approved by the same organizations that performed the original review and approval..."

Contrary to the above, corrective maintenance was performed on a main coolant pump with a procedure containing unauthorized changes contrary to the requirements of Administrative Procedure AP-0001 concerning procedure changes.

Response

Maintenance personnel have been reminded of the requirements of AP-0001 stating that: "...Operating and Administrative Procedures may be temporarily changed with the signal approval of two Senior Reactor Operators and that such changes shall be documented and subsequently reviewed by PORC and approved by the Plant Superintendent or the Asst. Plant Superintendent..."

Maintenance Procedure OP-5204, Main Coolant Pump Inspection and Repairs, is in the process of being revised to incorporate the new torque and clearance limits.

2. Criterion V, Appendix B, 10 CFR 50 states in part: "Activities affecting quality shall be...accomplished in accordance with those (prescribed) instructions, procedures, or drawings."

Contrary to the above, shift supervisors and control room operators failed to document their review of active Bypass of Safety Functions and Jumper Control Requests as required by Administrative Procedure AP-0018.

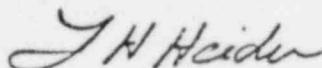
Response

Shift supervisors and control room operators have been reminded of the Administrative Procedure AP-0018 requirement to review active "Bypass of Safety Function and Jumper Control Requests. Additionally, the Operations Supervisor shall monitor the "Active" requests more closely to insure that shift supervisors and control room operators document their reviews.

We trust you find this information satisfactory; however, should you desire additional information please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



L. H. Heider  
Manager of Operations