

YANKEE ATOMIC ELECTRIC COMPANY



20 Turnpike Road Westborough, Massachusetts 01581

February 7, 1975

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attention: Office of Inspection and Enforcement

Reference: 1) License No. DPR-3 (Docket No. 50-29)
2) AEC Inspection Report No. 50-29/1-16,
dated January 10, 1975

Dear Sir:

This letter is written in response to your letter dated January 10, 1975, Reference 2, which indicates that five items appeared to be in violation of AEC requirements. These items were reported as a result of an inspection conducted on December 18, 19, and 20, 1974 at the Yankee Facility in Rowe, Massachusetts.

Information is submitted in answer to the alleged violations contained in Enclosure 1 of your letter as follows:

A. Category II Violations

1. No response required.
2. Technical Specification E.4.a. classifies as an abnormal occurrence. "A safety system setting less conservative than the limiting setting established in the technical specifications." Technical Specification E.2.a. states in part that in the event of an abnormal occurrence, "A notification shall be made within 24 hours...to the Director of the Regional Regulatory Operations Office."

Contrary to the above, a reactor trip setting on one of two main coolant low flow trip circuits was not reported as an abnormal occurrence when found by the licensee on July 15, 1974, to be set less conservatively than the safety system setting established by the licensee.

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Response

Plant instrument supervisory personnel have been reminded that all instances of failure to meet the setpoint criteria of safety related surveillance procedures must be reported to the Plant Superintendent, or his designated alternate, for evaluation. In the future similar findings will be reported in accordance with the Technical Specifications.

3. Criterion VI of Appendix B to 10 CFR 50 states in part:
"Measures shall be established to control the issuance of documents, such as...drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed..."

Additionally, QA procedure WO-105, "Procedures, Drawings and Specifications," requires in part that plants are to be responsible for the accuracy of their drawings.

Contrary to the above, an approved plant procedure to control the issuance of drawings including changes thereto did not exist. Additionally, 3 drawings in the plant files (drawings 517 F 069, 9699-FK-1A, and 9699-FM-3A) had not been revised to include the changes required by PDCR 74-3 which was completed on July 30, 1974. We note that the 3 drawings described above were revised to include the appropriate changes prior to the completion of this inspection.

Response

It is acknowledged that the plant has not completed preparation of a procedure to control plant drawings due to the greater priority need to develop several hundred operational procedures to comply with previous AEC audits.

The size of the plant and the intimate knowledge of plant system details by the Department Heads would preclude using the unchanged drawings in the preparation of Design Changes.

The normal process of revising drawings in the plant files requires forwarding a marked up drawing to NSD Operations for updating of the master drawing which is then sent to a commercial organization for reproduction. Corrected copies are then forwarded to the plant. Due to a variable workload at all these locations this process may take several months.

4. Criterion XII of Appendix B to 10 CFR 50 states in part:
"Measures shall be established to assure that...measuring and testing devices used in activities affecting quality are properly...calibrated..."

Contrary to the above, requirements have not been established by the plant to obtain and document "as-found" conditions for measuring and testing equipment calibrated off site. This is considered to be an improper calibrating measure in that it does not allow the plant to determine when instruments have been found to be out of calibration.

Response

The plant has requested an "as-found" calibration from off site contractors in the past with little success. Additional efforts will be made to locate contractors who will provide this service.

B. Category III Violations

1. Criterion V of Appendix B to 10 CFR 50 states in part:
"Activities affecting quality shall be...accomplished in accordance with...instructions, procedures, or drawings."
 - Contrary to the above, the following are examples of failure to follow established procedures:
 - (a) Changes were made to procedures OP-6101, RP-1601, and OP-6000.16 without being approved by two Senior Licensed Operators as is required by procedure AP-0001.

Response

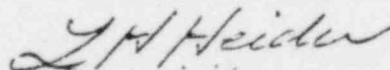
The cognizant Department Heads have been reminded that under the requirements of Revision 2 of AP-0001 temporary changes to approved procedures that do not change the intent of the procedure cannot be made without the approval of two senior reactor operator licensees.

- 1.(b) No response required.

We trust you will find this information satisfactory; however, should you desire additional information feel free to contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



L. H. Heider
Manager of Operations