

ENCLOSURE 1

DESCRIPTION OF VIOLATIONS

Yankee Atomic Electric Company
20 Turnpike Road
Westborough, Massachusetts 01581
Docket No. 50-29
License No. DPR-3

Certain activities under your license appear to be in violation of AEC requirements. These violations are considered to be of Category II and Category III severity.

A. Category II Violations

1. Technical Specification B.1 incorporates by reference the entire Section 212, "Safety Injection System," of the Final Hazards Summary Report (FHSR). Paragraph 212.6 of FHSR Section 212 states in part that "During each refueling interval at least 2 LPSI and 2 HPSI will be flow tested. Acceptable performance shall be that the pumps attain flow values comparable to the safety analysis."

Contrary to the above, a surveillance test conducted during the Summer 1974 refueling interval demonstrated that Low Pressure Safety Injection pumps were incapable of attaining the flow values comparable to those assumed in the safety analyses. We have evaluated action initiated by you and no response to this violation is required. (Licensee letter to RO:I dated December 11, 1974, licensee letters to the Directorate of Licensing dated December 12 and 30, 1974)

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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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.

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.

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.
- (b) Certain quality assurance records were not maintained in fireproof files in accordance with procedure AP-0221.

We note that you have recognized the problem indicated in B.1.(b) above and have ordered extra fireproof files to correct the situation. No further response to B.1.(b) is required.