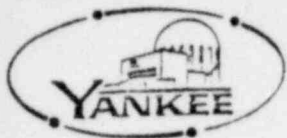


# YANKEE ATOMIC ELECTRIC COMPANY



20 Turnpike Road Westborough, Massachusetts 01581

April 12, 1976

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

Attention: E. J. Brunner, Chief  
Reactor Operations and Nuclear Support Branch

Reference: (a) License No. DPR-3 (Docket No. 50-29)  
(b) USNRC letter to YAEC, with enclosures,  
dated March 15, 1976.

Dear Sir:

This letter is written in response to Reference (b) which indicates that four of our activities were not conducted in full compliance with Nuclear Regulatory Commission requirements.

A. Apparent Violation

Contrary to 10 CFR 20.203(c)(2), requirements to control each entrance or access point to a high radiation area, the access to the high radiation area containing the Waste Holdup and Activity Dilution Delay tanks was neither equipped with the required control devices nor locked during the period August 21, 1975 through February 10, 1976.

The access to this area was properly locked prior to the completion of the inspection. However, a response detailing actions taken or planned to prevent recurrence is needed on this item.

A. Reply

As stated in the inspector's report, access to the areas containing the Waste Holdup and Activity Dilution Decay Tanks were properly locked prior to the completion of his inspection. This was accomplished through the application of padlocks on the blocking devices which had previously been installed on the tank area access ladders.

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Future entry into either of the areas in question will be controlled on an individual entry approval basis through the implementation of administrative controls established by the Chemistry and Health Physics Department supervisor who shall maintain control of the blocking device padlock keys. This action will provide the necessary positive area control in the future.

B. Apparent Violation

Contrary to 10 CFR 50, Appendix B, Criterion XVIII and the Operational Quality Assurance Manual, Section V, item XVIII.10 requirements that audit results be documented and reviewed by management having responsibility in the area audited, four of the sixteen audits conducted in 1975 had not been reviewed by the Manager of Operations as required through issuance of Plant Position Reports within the prescribed (AP-0208) 30 day period.

This is a Deficiency.

The four Plant Position Reports were generated and forwarded for review prior to completion of the inspection. No additional response is required for this item.

b. Reply

As stated in inspection report, no additional response is required on this item.

C. Apparent Violation

Contrary to 10 CFR 50, Appendix B, Criterion XVI and the Operational Quality Assurance Manual, Section V, item XVI.2 requirements that measures be established to assure that conditions adverse to quality be promptly identified and corrected; measures had not been established to assure prompt correction; in that the licensee's prescribed action on his 12/27/74 audit finding that there was an inadequacy in the system for updating the FSAR (FHSR) for design changes or modifications was not resolved as of 2/10/76.

This is a Deficiency.

C. Reply

Procedure(s) will be written or revised as necessary to assure that corrective actions are completed in a timely manner (immediately when conditions warrant). The Procedure(s) will provide for Plant and Yankee Nuclear Services Division Management

review whenever scheduled completion dates for corrective action are exceeded. Provisions for rescheduling of completion dates, when justifiable, will be included in the Procedure(s). The Procedures will provide for immediate initiation of rectification of discrepancies which could affect the health and safety of the public or plant personnel. The subject procedure(s) will be implemented within 90 days of the date of this letter.

D. Apparent Violation

Contrary to 10 CFR 50, Appendix B, Criterion II and the Operational Quality Assurance Manual, Section V, item II requirements that the structures, systems and components to be covered by the quality assurance program be identified and that the quality assurance program shall provide control over activities affecting the quality of the identified structures, systems, and components to an extent consistent with their importance to safety: boron used to control reactivity, and fuel oil used in the emergency diesel are not covered by the quality assurance program.

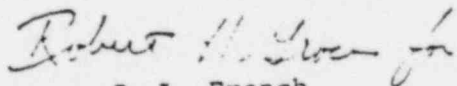
D. Reply

We take exception with the auditor's position on the above deficiency item. We have performed a review of all applicable ANSI Standards and Regulatory Guides and feel that at present there is no justification for the position taken by the auditor that these items be covered by our Quality Assurance program.

There may be plans to develop guides which will cover items such as fuel oil systems and chemicals and at that time we will comment on those items; however, until such guides have been issued we feel that identification of deficiencies in the areas to be covered by these guides is premature and therefore believe that the audit finding is an invalid one.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

  
J. L. French  
Manager of Operations

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