Reactor Facilities,
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# YANKEE ATOMIC ELECTRIC COMPANY



20 Turnpike Road Westborough, Massachusetts 01581

June 7, 1976

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

Attention: Mr. E. J. Brunner, Chief,

Reactor Operations and Nuclear Support Group

Reference: 1. License No. DPR-3 (Docket No. 50-29)

USNRC Inspection Report No. 76-11, May 14, 1976.

Dear Sir:

This letter is in response to your report, Reference 2, concerning two infractions reported by your inspector.

#### Infraction No. 1

Technical Specification D.1 states in part that: "All plant operations which have a significant direct or potential effect on the reactor and its auxiliary systems shall be conducted in accordance with written procedures ..."

Procedure OP-4201, Rev. 5, "Power Range Channel Calibration." prescribes the specific method of calibrating the power range channels during periods of steady state power operation and states in part: "The power range neutron flux level channel amplifiers will be adjusted on each shift to agree with the primary plant thermal energy balance ..."

Contrary to the above, the power range neutron flux level channel amplifiers were adjusted in a nonconservative direction with regard to the existing thermal energy balance, and without adherence to the requirements of OP-4201.

### Response No. 1

As described on page 10 of the reference inspection report corrective action was performed prior to completion of the inspection, and accordingly Procedure OP-4201 has been revised to clarify the calibration procedure.

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## Infraction No. 2

Technical Specification D.1 states in part: "All written operating procedures and modifications thereto shall be prepared by personnel possessing A.E.C. operators licenses ..."

Procedure AP-001, Rev. 5, "Plant Procedures," states in part:
"changes to approved procedures, that clearly do not change the
intent of the procedure may be made with the concurrence of two
individuals holding senior operator licenses. ... At the earliest
convenience, the procedure shall be forwarded to TAPS for logging,
PORC review and the plant superintendent's approval."

Contrary to the above, Procedure OP-2163, Rev. 0, "Starcup of Purification System," was changed by the operator performing the procedure without prior concurrence and subsequent review and approval. The intent of the approved procedure was not affected.

### Response No. 2

All plant technical, maintenance and operational personnel have been cautioned that any changes to approved plant procedures shall comply with the provisions of Procedure AP-0001, "Plant Procedures" prior to their implements.on.

We trust that you will find this response satisfactory.

Very truly yours,

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YANKEE ATOMIC ELECTRIC COMPANY

J. L. French

Manager of Operations

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