

APPENDIX A

NOTICE OF VIOLATION

Vermont Yankee Nuclear Power Corporation

Docket No. 50-271

Based on the results of an NRC inspection conducted on August 12-15, 1980, it appears that certain of your activities were not conducted in full compliance with the conditions of your NRC License No. DPR-28 as indicated below. Item A is an infraction and Item B is a deficiency.

- A. Yankee Atomic Electric Company Operational Quality Assurance Program (YOQAP-1-A), Section II, Quality Assurance Program, Paragraph C, Implementation, states in part:

"Establishment of an effective Operational Quality Assurance Program is assured through consideration of and conformance, where applicable, with the below listed Federal documents and ANSI standards.

1. Title 10 of the Code of Federal Regulations, Part 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants."

10 CFR 50, Appendix B, Criterion V, requires, in part:

"Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

YOQAP-1-A, Section V, Paragraph B, requires, in part:

"Persons preparing and approving documents are responsible for assuring that specifications, instructions, procedures, and drawings include appropriate quantitative or qualitative acceptance criteria for determining that activities have been satisfactorily accomplished;...and assuring that the documents are kept current."

10 CFR 50, Appendix B, Criterion VI, requires, in part:

"Measurements shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality (and further) 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."

YOQAP-1-A, Section V, Paragraph C, requires, in part:

"Establishment of provisions which clearly delineate the sequence of actions to be accomplished in the preparation, review, approval, and control of instructions, procedures, and drawings."

YOQAP-1-A, Section VI, Paragraph C.1, requires, in part:

"Inclusion of approved changes in instructions, drawings, and other applicable documents prior to placing the system in operating status."

Contrary to the above, as of August 15, 1980, with the Instrument Air System in an operating status, the inspector determined that valves V72-90E, inline isolation valve (Air Supply Valve to Main Steam Isolation Accumulators and the Main Steam Safety Relief Accumulator), and V-72-152, test connection valve and associated downstream cap, were installed in the Instrument Air System on January 10, 1980 in accordance with Plant Design Change Request (PDCR) No. 79-08 without the valve numbers, description, or actual position being incorporated into the applicable system operating procedure, R.P. 2191, Containment Instrument Air System. Additionally, VYAP 6000, Plant Design Change Request, Revision 7, dated May 5, 1978, does not contain provisions for controlling procedure change documents to assure their inclusion into applicable documents prior to placing the system in operating status.

7. Technical Specification 6.6.A.2 requires that records of principal maintenance activities, including inspection and repair of principal items of equipment pertaining to nuclear safety be retained for at least five years.

- (1) AP 0013, Plant Record Retention, Appendix A, requires retention of maintenance procedure data sheets for six years.

Contrary to the above, procedure data sheets concerning maintenance of the following principal items of equipment pertaining to nuclear safety were not maintained:

- Weld data sheet (VYAPF 0203.01) associated with Maintenance Request No. 79-0852, performed November 1, 1979 with provided various certifications and inspections for the cutting and rewelding of a section of piping in the Standby Liquid Control System piping.
 - Valve packing checklist required by Procedure OP 5201, "Safety System Valves" which provides various certifications for repacking of safety related valves used for Maintenance Request No. 80-0014, performed January 5, 1980 for repacking of RHR System Valve RHR-81B.
- (2) Yankee Atomic Electric Company Quality Assurance Program, Section II, which, in part, provides the requirements for plant inspections, requires compliance to the requirements of ANSI N18.7-1976.

ANSI N18.7-1976, Paragraph 5.2.17, requires that independent inspection records of routine, safety related, maintenance be maintained.

Contrary to the above, records of independent inspections performed for safety related routine maintenance were not being maintained.