



CONNECTICUT YANKEE ATOMIC POWER COMPANY

TELEPHONE  
203-666-6911

BERLIN, CONNECTICUT  
P. O. BOX 270 HARTFORD, CONNECTICUT 06101  
October 16, 1980

DOCKET NO. 50-213  
A01173

Mr. Eldon J. Brunner, Chief  
Reactor Operations and Nuclear  
Support Branch  
U. S. Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Reference: Letter, E. J. Brunner to W. G. Council  
dated September 24, 1980  
Inspection 50-213/80-15

Gentlemen:

This correspondence is in response to the Notice of Violation as described in the report of Inspection 50-213/80-15 that was conducted during August 25-28, 1980.

Deficiency

- A. 10 CFR 50.54(i-1) states, in part, "Holders of operating licenses in effect on September 17, 1973 shall implement an operator requalification program which, as a minimum, meets the requirements of Appendix A of 10 CFR 55... which was submitted for approval by the Atomic Energy Commission."

The Haddam Neck Plant Operator Requalification Program dated December 21, 1977 states in Section 4.4 that, "No more than two licensed personnel will be exempt from evaluation based on their participation in the preparation and administration of the evaluations."

Contrary to the above, three licensed personnel were exempt from the 1979 Annual Requalification Program Examination.

810 1160587

Response

This deficiency was a result of a numerical limit on the number of examination exemptions. The limit of two, established in our Operator Requalification program, was exceeded when all three members of the Training staff were utilized to develop and evaluate the 1979 annual exam.

The Operator Requalification program, as revised, removes the number limitation on exemptions. This revision has been submitted to the Operator Licensing Branch of the Nuclear Regulatory Commission.

Presently all licensed personnel except those involved in the preparation and evaluation of exams are required to participate.

Based on this revision Connecticut Yankee is now in full compliance with the requirements for participation in Requalification exams.

Deficiency

- B. 10 CFR 55, Appendix A states, in part, "3. On-the-job training. The requalification program shall include on-the-job training so that: d. Each licensed operator and senior operator reviews the content of all ... emergency procedures on a regularly scheduled basis."

The Haddam Neck Plant Operator Requalification Program dated December 21, 1977 states in Section 2.2 that, "All Emergency Procedures will be scheduled for annual review."

Contrary to the above, no evidence was available to document that all operators had reviewed all emergency procedures during 1979.

Response

This deficiency was a result of an attempt to review Emergency Operating Procedures (EOPs) in a classroom environment, as opposed to the self study technique previously used.

Scheduling problems and time limitations resulted in less than 100% review of procedures by all licensed personnel. Therefore, EOP review is again being accomplished by the scheduled self study technique.

Based on the proven effectiveness of this technique Connecticut Yankee is now in full compliance with the EOP review requirements of Operator Requalification.

Licensee Identified Item of Non Compliance

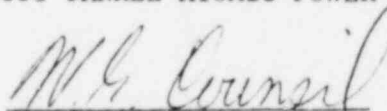
In a telephone conversation between the inspector and the licensee's representative on September 3, 1980, confirmation was received that the corrective action report addressing the corporate audit findings, would specify that a mechanism be developed to assure a timely review of all pertinent facility design changes by all licensed operators and senior operators. The failure to provide evidence that substantiates review of design changes has been termed a licensee identified item of noncompliance. The fulfillment of the corrective action commitment in this regard will be the subject of a future inspection (213/80-15-04).

Response

Design Change Request review, by licensed personnel, following completion of the change remains unresolved. The Quality Assurance and Engineering Departments are committed to resolve this problem by January 1, 1981.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY



W. G. Council,  
Senior Vice President