

YANKEE ATOMIC ELECTRIC COMPANY

B.4.1.1



20 Turnpike Road Westborough, Massachusetts 01581

WYR 79-18

February 22, 1979

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

Attention: Office of Inspection and Enforcement
Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch

Reference: (a) License No. DPR-3 (Docket No. 50-29)
(b) I&E Letter to YAEC dated January 31, 1979,
I&E Inspection Report 79-19

Dear Sir:

Subject: Response to I & E Inspection 50-29/78-21

Reference is made to I & E Inspection No. 50-29/78-21 which was conducted by your Dr. R. Bores from November 27 to December 3 of 1978 at the Yankee Nuclear Power Station (Yankee-Rowe) in Rowe, Massachusetts. The report written subsequent to this inspection identified three items which the inspector felt were not conducted in full compliance with NRC requirements.

In accordance with the requirements of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, we are submitting the following actions taken on these items:

ITEM A

"Section 6.8.1 of Technical Specifications (TS) requires, in part, that written procedures be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972, which includes procedures for implementing the Emergency Plan. The Emergency Plan and Implementing Procedures (OP-3300, OP-3301, and OP-3302) specify airborne radioactivity levels of MPC and 10 MPC as levels associated with specified emergency actions.

"Contrary to these requirements, as of December 1, 1978, Procedure OP-3303, Revision 3, 'Emergency Off-Site Radiation Monitoring,' was inadequate, in that the combination of sampling and analytical techniques employed would not allow measurement of airborne action levels of MPC or 10 MPC."

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RESPONSE

1. Corrective Steps Taken and Results Achieved:

A decision has been made to make use of on-site counting equipment for analysis of samples. This equipment can easily achieve the required sensitivity. In the event the on-site equipment cannot be used, the samples would be sent by courier to the Vermont Yankee Nuclear Power Station or the Yankee Environmental Lab for counting. Both of these facilities are within two hours of the site. Appropriate changes to the implementing procedures will be made to accomplish and implement the decision above.

2. Steps Taken to Avoid Further Items of Non-Compliance:

An additional decision has been made to modify Yankee Rowe's accident classification criteria to coincide with the EPA Protective Action Guides. This has direct impact on this item in that the existing portable monitoring and sampling equipment will be able to measure the level required. This, however, is an involved modification and will take some time. Additionally, a careful re-evaluation of existing equipment and other equipment coming on the market will be done.

3. Date When Full Compliance Will Be Achieved:

Implementation of the steps outlined in Item 1 above, which effectively will bring Yankee-Rowe into compliance with the existing procedural boundary airborne levels, will be completed by July 31, 1979. No time commitment can be given for the steps outlined in Item 2, however, due to the uncertainty in the time frames needed to implement a change which interfaces with the State Plans and the other Yankee plants.

ITEM B

"Section 6.8.1 of the TS requires, in part, that written procedures be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972, which includes implementing procedures for the Emergency Plan.

"Procedure, AP-0504, 'Emergency Plan Training,' written pursuant to the above requirements, requires, in part, that Road Barrier Teams be given formal and practical demonstration training on an annual basis, and that the Vermont and Massachusetts Departments of Health be invited annually to attend the Emergency Coordinator refresher training.

"Contrary to the above, as of December 1, 1978, the Road Barrier Teams had not received the formal and practical demonstration training during the previous year, nor had the Vermont and Massachusetts Departments of Health been invited to attend the Emergency Coordinator refresher training in 1978."

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RESPONSE

1. Corrective Measures Taken and Results Achieved:

Future training for the Road Barrier Teams will include demonstration training on equipment and barrier locations. In addition, the Vermont and Massachusetts Departments of Health will be invited to attend Yankee-Rowe Emergency Coordinator Training.

2. Steps Taken to Avoid Further Items of Non-Compliance:

Same as in Item 1 above.

3. Date When Full Compliance Will Be Achieved:

Full compliance shall be achieved upon completion of the commitments in Item 1 above during the routine 1979 Emergency Plan training schedule.

ITEM C

"Section 6.8.1 and Section 6.11 of the TS requires, in part, that procedures be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972, which includes implementing procedures for the Emergency Plan and for personnel radiation protection.

"Procedures DP-8550, Revision 3, and OP-4804, written pursuant to the above requirements, require, in part, that personnel dosimeters for use in emergencies be calibrated annually.

"Contrary to these requirements, as of December 1, 1978, emergency personnel dosimeters, including 50 R dosimeters 50-292, 50-297, 50-299, 50-305 and 50-306 and 200 R dosimeters 200-131 and 200-138, were not calibrated since June, 1977, exceeding their required calibration interval."

RESPONSE

1. Corrective Measures Taken and Results Achieved:

The pocket dosimeters in question were immediately replaced with calibrated dosimeters.

2. Steps Taken to Avoid Further Items of Non-Compliance:

A complete review and inspection of all emergency dosimeters and equipment requiring recalibration was performed. No other items of this nature were discovered.

3. Date When Full Compliance Will Be Achieved:

Full compliance was achieved on December 1, 1978.

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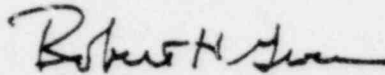
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We trust this information will be satisfactory. Should additional information be required, please feel free to contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



Robert H. Groce
Licensing Engineer

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