

ADM/TDC



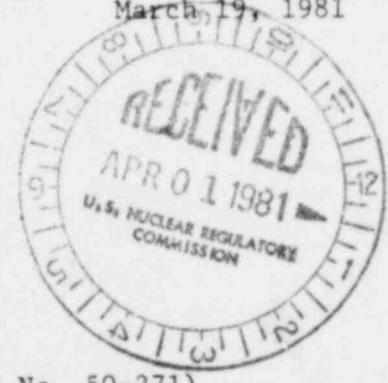
VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET
RUTLAND, VERMONT 05701

FVY 81-46
2.C.2.9

REPLY TO:
ENGINEERING OFFICE
1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 817-872-8100

March 19, 1981



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

Attention: Mr. Boyce Grier, Director

- References:
- (a) License No. DPR-28 (docket No. 50-271)
 - (b) Letter Boyce H. Grier (USNRC) to R.L. Smith (VYNPC) dated December 19, 1980, IE Bulletin 80-25

Dear Sir:

Subject: Response to IE Bulletin 80-25, Operating Problems with Target Rock Safety Relief Valves at BWRs

Reference (b) delineates certain actions to be taken by BWR licensees and subsequent reporting requirements. The following information is submitted on behalf of Vermont Yankee.

Item 1 "If your facility has not yet installed or changed or is presently in the process of changing to the two-stage S/R valves, initiate appropriate quality control procedures to assure inspection of the solenoid actuators for excess Loc-tite prior to operation. If the solenoid actuator manufactured by Target Rock Corporation is already installed in your facility, confirm its operability either by its operational performance (i.e., it has functioned as designed following an aging period of about 3 months in the higher temperature environment of power operating conditions) or by functional testing at full pressure during the next refueling shutdown of the facility. Include in your report the results of all attempts to operate the two-stage S/R valve(s)."

Response: Vermont Yankee has not installed, and has no plans to install in the near future, Target Rock two-stage S/R valves with the Target Rock two-stage solenoid actuator. We presently have four Target Rock three-stage S/R valves with ASCO solenoid operators. This item, therefore, does not apply to Vermont Yankee.

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Item 2 "In the event that a S/R valve, regardless of make or model (e.g., both two or three stage), fails to function as designed, excepting for pressure setpoint requirements, and the cause of the malfunction is not clearly determined, understood, and therefore corrected, standard operating procedures shall require that the entire valve be removed from service, disassembled, inspected, adjusted, and pressure setpoint tested with steam for proper operation prior to returning the valve to service. These overhaul requirements shall be at least equivalent to those applicable to periodic surveillance rehabilitation requirements. Appropriate revisions to your operating procedures shall be made to include these requirements."

Response: The actions required describe Vermont Yankee's standard operating practice. There may be circumstances under which a modified approach may be appropriate and would be followed. It would not be appropriate to include these requirements in our operating procedures.

Item 3 "A review of your S/R valve pneumatic supply systems shall be performed to determine the potential for and magnitude of an overpressure condition. The determined overpressure potential of the pneumatic supply shall be compared with the maximum operating pressure capabilities of the solenoid actuator valves serving the S/R valves, so as to determine whether supply pressure could result in valve malfunction. Protective devices (such as relief valves) shall be installed in the proximity of the S/R valves and set to protect against supply pressure in excess of the operating pressure capabilities of the solenoid actuator device. In addition, consideration should be given to modification or replacement to reduce the sensitivity of the solenoid actuator to pneumatic supply overpressure. Further, the failure, either high or low, of the pneumatic supply system shall be annunciated to the Control Room operator. The annunciated supply pressure should be measured at a location as close as practical to the S/R valves and downstream of any check valve connecting two or more pneumatic sources. Appropriate operating procedures shall be provided to guide operator response to such an occurrence of high or low supply pressure."

Response: The instrument air system operates between 95 and 110 psi and is regulated by pressure switch activated compressor unloaders. The system is further protected by a series of

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pressure relief valves set at 150 psi. Tests conducted by our Instrument and Control Department demonstrate that the ASCO solenoids function properly at pressures in excess of 150 psi. We conclude that the air supply system to the solenoids is adequately protected against over pressurization.

Although we currently have low air supply pressure alarms in the Control Room, we will modify our annunciator system to indicate both high and low pressure in the instrument air system. Vermont Yankee expects to have this modification completed, and the appropriate operating procedure revised, by the end of the 1981 refueling outage.

We will report the completion of this modification, in a supplement to this response at that time.

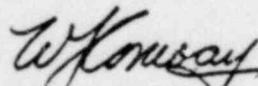
The following information is submitted in response to your request for estimates of manpower expended in the research and subsequent performance of actions associated with this bulletin.

<u>Manpower Requirements</u>	<u>Man-Hours</u>
Bulletin Response	45
Corrective Actions	0

We trust that the above supplied information and our commitment to modify the annunciator system during the 1981 refueling outage is satisfactory; however, should you desire additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

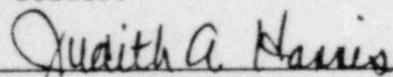


William F. Conway

Vice President and Manager of Operations

STATE OF VERMONT)
) ss
 WINDHAM COUNTY)

Then personally appeared before me, William F. Conway, who, being duly sworn, did state that he is a Vice President of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing request in the name and on the behalf of Vermont Yankee Nuclear Power Corporation, and that the statements therein are true to the best of his knowledge and belief.



Judith A. Harris

Notary Public

My Commission Expires February 14, 1983