



CONNECTICUT YANKEE ATOMIC POWER COMPANY

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CYH 77-96

March 22, 1977
Docket No. 50-213

U. S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attn: Mr. James P. O'Reilly
Director

Dear Mr. O'Reilly:

This letter acknowledges completion of the review required by IE Circular 76-07 dated December 17, 1976. Responses to the three matters identified on page three of the subject circular are hereby provided.

1. Program for periodic shift and operator training whereby incidents which occur at your facility as well as at other licensed reactors, including all significant personnel errors, will be reviewed with the objective of identifying "the lessons to be learned".

Response

The USNRC's Office of Management Information and Program Control Licensee Event Summary Reports will be utilized to insure that licensed operators are aware of events occurring at other facilities within the nuclear industry. The periodic on-shift discussion period will include a review of events that have occurred at other facilities, with particular emphasis on personnel errors at all reactors and all events at pressurized water reactors.

2. Procedures routinely implemented by knowledgeable individuals to qualitatively assess the performance of the operating and support staff in such areas as adherence to operating procedures, use of systems checklists, and implementation of component and system tagouts. This should include review of the degree to which operating procedures, tagout procedures, and checklists require signoff, i.e., signature or initials to verify completion and to identify the responsible personnel.

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Response

There are two procedures which require that detailed written procedures, including applicable check-off lists and instructions are prepared and approved for operation and testing of all systems and components involving nuclear safety. Quality Assurance Procedure, QA 1.2-5.2, "Procedure Format", establishes the standard format for all plant procedures, including operating procedures. It specifically calls out for the use of check-off lists, valve lineups and test data sheets.

Administrative Procedure, ADM 1.1-2, "Plant Operating Procedures", requires plant personnel to insure that detailed written procedures, including applicable check-off lists and instructions, are prepared, approved and adhered to.

Plant Operating and Surveillance Procedures require in addition to initialing the check-off list, signatures of the responsible personnel who performed the test or operation, signature of review by the Shift Supervisor, and signature of review by the Department Head.

Surveillance Procedures receive an additional review in accordance with QA Procedure, QA 1.2-11.2, "Review of Test Data". This procedure requires review by the Quality Control Coordinator to assure their completeness.

In summary, it appears that Connecticut Yankee has adequate and complete review mechanisms established and built into the operating and surveillance test procedures presently in use.

3. Procedures for random backshift and weekend visits by management and supervision to the facilities, to monitor and assess operation including crew manning and performance, equipment status and plant conditions.

Response

Although not formalized by written procedures, Plant Management and supervision randomly visit the plant on weekends and backshifts as part of their normal duties. Members of the Connecticut Yankee staff who hold operator licenses routinely visit the plant to fulfill their operator retraining requirements. While fulfilling the licensed operator retraining requirements, they monitor and assess operations including crewmanning and performance, equipment status and plant conditions. Additionally, the assigned operations duty officer, a member of the plant supervisory staff, may visit the plant during backshifts and weekends, particularly during off normal operations.

It is our opinion that procedures and practices currently in effect at Connecticut Yankee adequately insure that Operator errors are and will be minimized.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

D. C. Sullivan