



CONNECTICUT YANKEE ATOMIC POWER COMPANY

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February 18, 1981
DOCKET NO. 50-213
A01487

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

Attn: Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear
Support Branch

Reference: Letter, E. J. Brunner to W. G. Council,
dated January 16, 1981
Inspection 50-213/80-18

Dear Mr. Brunner:

Inspection Number 50-213/80-18 was conducted on October 6-10, 1980, at the Haddam Neck site by your office. This inspection resulted in three violations as defined in the reference above. This letter is being submitted as required by Section 2.201 of the Nuclear Regulatory Commission's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations. It is being submitted ten days after the required 20 day response as agreed upon by yourself and R. H. Graves, Station Superintendent, by telephone conversation on February 4, 1981. The following are our responses to the identified violations.

Item A (Infraction)

Technical Specification 6.8.1 states, in part, "Written procedures ... shall be established, implemented and maintained ..."

Plant procedure QA 1.2-11.2, Paragraphs 5.1, 5.3, 6.2, 6.4, and 7.1 require, in part, that the department head review, evaluate, and approve by signature satisfactory test results; that unsatisfactory test results not be signed and be clearly identified on data sheets; and that approved test results be forwarded to the QA Department for review.

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Contrary to the above, test data containing unsatisfactory results were approved by the department head; other test results were not reviewed or contained identified unsatisfactory data which were not evaluated to determine if it was acceptable or if corrective action would be required; and numerous tests were not forwarded to the QA Department for review.

Response

The above stated findings point out a generic problem that has developed because of changes made in the handling of surveillance test data without concurrent changes in implementing procedures. This problem is recognized and department instructions will be written to provide more detailed instructions on the handling and review of surveillance test results. These instructions will be complete by March 1, 1981. It should be noted that a proper review was being performed on all surveillance test results, but in cases where discrepancies existed written documentation did not exist to show this review. Also, the alleged unsatisfactory test results were not unsatisfactory, but were noted to be outside of a normal operating range. No technical specification limits were exceeded.

Item B (Infraction)

The following Fire Protection Systems surveillances required by Section 4.15 of the Technical Specifications were not properly implemented, in that:

1. -- Technical Specification 4.15.B.1.b, which became effective February 6, 1978, requires in part, that at least once per 18 months (+ 25%) a flow test to assure no blockage, shall be performed for the CO₂ System Headers.

Contrary to the above, as of October 10, 1980, the following tests that were required to be completed by December 22, 1979 were either not performed or performed late:

- (1) Primary Auxiliary Building Charcoal Filters CO₂ Systems - not completed.
- (2) Cable Vault System - completed June 16, 1980.

Response

As stated above the required tests were not completed in the required surveillance time interval. The Primary Auxiliary Building Charcoal Filters CO₂ System was satisfactorily tested on October 17, 1980. Both the above mentioned tests and numerous other surveillance tests are being put into our surveillance programs which should eliminate further missed time intervals. This program is expected to be updated by April 1, 1981.

Item B (Infraction)

2. -- Technical Specification 4.15.F. 6.3, which became effective October 3, 1978, requires a visual inspection of each spray and/or sprinkler system nozzle at least once per 18 months \pm 25% to verify no blockage exists.

Contrary to the above, as of October 10, 1980, visual inspection of each spray and sprinkler system nozzles, which was required to be completed by August 19, 1980, had not been completed.

Response

The appropriate procedure has been updated to include the above mentioned inspections. These inspections will be performed and documented by March 1, 1981.

3. -- Technical Specification 6.8.1 states, in part "Written procedures ... shall be established, implemented and maintained that meet or exceed the requirements of ... Appendix "A" of USAEC Regulatory Guide 1.33 ..."
- Regulatory Guide 1.33, Appendix "A", Paragraph H2 requires, in part, that written procedures be established for each surveillance test and inspection required by the Technical Specifications.
- Technical Specification 6.10.1.d requires that records of surveillance activities required by the Technical Specifications be retained for at least five years.

Contrary to the above, the following tests required every 18 months \pm 25% by Technical Specification 4.15.f.b.1 and 2 were accomplished by fire insurance company personnel but were not accomplished using approved procedures, and no records of the tests and inspections were retained:

- (1) Simulation of Automatic Activation of Fire Protection System Spray and/or Sprinkler System
- (2) Visual inspection of Spray System spray headers.

Response

In the past an annual inspection was performed by our insurer on Fire Protection systems. The above mentioned tests were among those performed during these inspections. However when these Technical Specifications on fire protection were put into affect the proper plant procedures were not developed. These procedures are being developed and will be approved by April 1, 1981.

Item C (Deficiency)

Technical Specifications 6.8.1 and 6.8.2 state in part "Written procedures and administrative policies shall be established and maintained ... (and) procedure ... changes shall be reviewed by the PORC and approved by the Plant Superintendent prior to implementation ..."

Plant Procedure QA 1.2-6.4, "Temporary Procedure Change (TPC)", paragraph 5.1 states in part, "When a deviation from a procedure is required, a temporary procedure change (TPC) shall be utilized ..."

Plant Procedure QA 1.2-5.2, "Procedure Format", paragraph 8.19 requires the use of test data sheets and paragraph 8.9 states, in part, "... the criteria against which the success or failure of the test will be judged will clearly be identified ... these will be qualitative criteria - a given event does or does not occur ... (or) ... quantitative values shall be designated as acceptance criteria."

Contrary to the above, changes to one procedure were made without obtaining proper review and approval and another procedure did not adequately provide for recording data or adequately specify acceptance criteria in that:

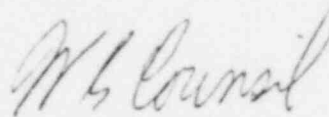
- Numerous pen and ink changes were made to plant procedure PM 9.1-9, "Fire Protection Equipment Inspection", performed September 11, 1980 without issuing a temporary procedure change nor obtaining PORC review and Plant Superintendent approval for the changes.
- Procedure SUR 5.1.15, "Semi-Annual Inspection of CO₂ Systems for Cable Vault and HEPA Filters and Halon System for Records Vault", steps 6.4 and 6.21 specify an acceptance criteria of not more than 10% loss for weight of CO₂ cylinders. However, the base weight for which the 10% criteria is applied is not specified or required to be recorded by the procedure. Additionally, the procedure does not provide for recording of the weights of the CO₂ cylinders.
- Procedure SUR 9.5-15, steps 6.7 and 6.24, require operation of pneumatic switches to ensure their proper operation but does not require documentation of proper operation of specific valves and dampers affected by these switches nor does the procedure specify any acceptance criteria for proper operation.

Response

As previously stated the implementing procedures for these fire protection technical specifications were a generic problem, in that they were either not in use within the allotted surveillance time, or they were not complete enough to cover all aspects of Technical Specifications. A review of these procedures is currently being performed and necessary changes or new procedures will be drafted and approved to fully implement the fire protection technical specifications by April 1, 1981.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

A handwritten signature in cursive script, appearing to read "W. G. Council".

W. G. Council
Senior Vice President