



VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET
RUTLAND, VERMONT 05701

2.C.2.11
FVY 81-60

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

April 9, 1981

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

Attention: Mr. Eldon J. Brunner, Chief
Reactor Projects Branch #1, DRPI

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) USNRC Letter to Mr. Robert L. Smith, VYNPC,
dated March 17, 1981, Inspection 50-271/80-22

Dear Sir:

Subject: Response to I&E Inspection Report No. 80-2.

This letter is written in response to Reference (b) which indicates that one of our activities was not conducted in full compliance with Nuclear Regulatory requirements. This was noted as a result of findings during an inspection on November 17, 1980-January 3, 1981, at the Vermont Yankee Nuclear Power Station in Vernon, Vermont.

Information is submitted as follows in answer to the alleged violation.

Item A (Severity Level V): Technical Specification 6.5.A requires that "Detailed written procedures involving Nuclear Safety, including applicable check-off lists and instructions, shall be prepared and approved. All procedures shall be adhered to. Procedures shall be prepared and approved covering the areas listed below... 6. Surveillance and Testing Requirements." Plant Procedure O.P. 4029 was developed pursuant to Technical Specification 6.5.A requirements. Appendix B to O.P. 4029 specifies the specific plant system Type A valve lineup that shall be performed to establish the CILRT test boundary.

8105290 382

United States Nuclear Regulatory Commission
April 9, 1981
Page 2

Technical Specification 6.5.D states that temporary changes to procedures described in Technical Specification 6.5.A which do not change the intent of the original procedure may be made with the concurrence of two individuals holding an SRO license. Procedure A.P. 0002 was developed pursuant to the requirements of Technical Specification 6.5.D to allow temporary changes to be made to procedures described in Technical Specification 6.5.A by requiring the concurrence of two individuals holding an SRO license and the issuance of a Department Instruction.

Contrary to the above, on December 18, 1980, temporary changes were made to Steps A.1, A.3, and A.10 of Appendix B to O.P. 4029 without the issuance of a Department Instruction. Although instructions contained in Appendix B allowed exceptions to the valve lineup list to be noted, the instruction did not provide for the required concurrence of two individuals holding an SRO license, or as otherwise specified by A.P. 0002 and Technical Specification 6.5.D.

Response: We do not concur with certain findings associated with this Item. Exceptions taken in Procedure Steps A.1 and A.3 have no bearing on valve positions as referenced in the Inspection Report. These exceptions simply correct typographical errors. O.P. 4029 is a properly approved procedure with respect to Technical Specification 6.5.C and, as noted by your Violation Notice, allows exceptions to valve lineups in Appendix B of the procedure. We maintain that the exceptions taken to the valve lineup were entirely proper and were resolved in the required manner.

Exceptions are specifically authorized by certain procedures to allow the Cognizant Individual the ability to make minor improvements to the procedure that do not change the intent of that procedure. These procedures generally involve activities that are large or complex such as valve lineups or integrated station startup procedures where the Cognizant Individual is extremely knowledgeable of the activity. Exceptions taken that involve realignment of plant equipment are always accomplished through the Shift Supervisor in accordance with established practice. Additionally, the Type A Test Procedure contains provisions for restoring the affected systems to the normal mode.

