## APPENDIX A

## NOTICE OF VIOLATION

Vermont Yankee Nuclear Power Corporation Framingham, Massachusetts 01701 Docket No. 50-271 License No. DPR-28

As a result of the inspection conducted on November 17, 1980 to January 3, 1981, and in accordance with the Interim Enforcement Policy, 45 CFR 66754 (October 7, 1980). the following violation was identified.

A. 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 OP 4029 was developed pursuant to Technical Specification 6.5.A requirements. Appendix 8 to OP 4029 specifies the specific plant system Type A valve lineup that shall be performed to establish the CILRT test boundary.

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 AP 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 OP 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 AP 0002 and Technical Specification 6.5.D.

This is a Severity Level V Violation (Supplement I.E).

Pursuant to the provisions of 10 CFR 2.201, Vermont Yankee Nuclear Power Corporation of Framingham, Massachusetts, is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

DATED MAR 1 7 1981

Eldon J. Crunner, Chief

Eldon J. Crunner, Chief /Reactor Projects Branch #1, DRPI

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