

Appendix A

Notice of Violation

Vermont Yankee Nuclear Power Corporation  
Vermont Yankee Station  
License No. DPR-28

Docket No. 50-271

As a result of an inspection conducted on November 17-21, 1980 and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. Technical Specifications 5.5.A, C, and D state, in part, the following: "A. Detailed written procedures ... including applicable checkoff lists ... covering ... [operation ... of systems and components of the facility ... ] shall be prepared ... approved [and] ... adhered to ... C. Procedures ... shall be reviewed and approved by the Plant Superintendent ... and the Manager of Operations ... D. Temporary changes to procedures ... shall be documented and subsequently reviewed by the PORC and approved by the Plant Superintendent ..."

Contrary to the above, improperly approved system valve lineup checkoff lists were performed, in that:

- OP 2123, Core Spray System, System valve lineup COL, Revision 10; OP 2112, Reactor Water Cleanup System, system valve lineup COL, Revision 10; OP 2126, Diesel Generator, system valve lineup COL, Revision 9; and several other system valve lineup COLs with revision numbers later than the currently approved revision numbers were observed in use. These revisions to the valve lineup COLs had been reviewed by the PORC but had not yet been approved by the Plant Superintendent and/or the Manager of Operations.
- Valves were added or deleted from the following valve lineups previously performed during 1979 without the changes being documented, reviewed by the PORC, or approved by the plant superintendent:
  - (1) Valve CU-50 was deleted from OP 2112, Reactor Water Cleanup System, Appendix A, valve lineup COL, Revision 8;
  - (2) Valve VG-4B-1A was added to OP 2125, Containment Atmosphere Dilution System, Appendix A, valve lineup COL, Revision 3; and

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- (3) Valves SW-200A-D were deleted from OP 2181, Service Water, Appendix A, system valve lineup COL, Revision 8.

Further examples are detailed in the enclosed inspection report.

This is a Severity Level V violation (Supplement I).

- B. 10 CFR 50, Appendix B, Criterion V, states, in part, "Activities affecting quality shall be prescribed by documented instructions [or] procedures ... of a type appropriate to the circumstances ..."

Yankee Operational Quality Assurance Program-I-A (YOQAP-I-A), Section II, Quality Assurance Program, requires, in part, compliance to the requirements of ANSI 18.7-1976.

ANSI 18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants, paragraph 5.2.15 states, in part, "The administrative controls ... shall provide measures to control ... issuance of documents ... which prescribe activities affecting safety related ... systems or components ... also include [ing] ... operating procedures ... [and] Paragraph 5.2.2 states, in part, "Procedures shall be followed ... "

The following administrative control procedures were not followed, in that:

- Procedure A.P. 0156, Valve Lineup File, paragraph 4 states "Changes to the normal valve positions are permitted when the system status dictates such changes are necessary. Each change, however, must be reviewed and initialed by the Shift Supervisor and provided with an explanatory note."

Contrary to the above, the following valve lineups performed in 1979 and maintained on file in the Control Room as the latest official valve lineups contained numerous valves or circuit breakers whose positions were changed without an explanatory note being added or being initialed by the Shift Supervisor:

- (1) OP 2143, 480 VAC System, Appendix A valve lineup COL, sheets 3 and 6.
- (2) OP 2153, Solid Radwaste, Appendix A valve lineup COL, sheets 2, 3 and 4.
- (3) RP 2171, Condensate Demineralizer System, Appendix A valve lineup COL.
- (4) OP 2180, Circulating Water/Cooling Tower Operation, Appendix A valve lineup COL, sheet 7.

- AP 0156, Valve Lineup File, paragraph 3, states, in part, "Completed copies of valve lineup sheets are returned to the Control Room and reviewed and signed by the Shift Supervisor ..."

Contrary to the above, the following valves were not lined up and were annotated as "Can't Locate" for OP 2150, Advanced Off Gas System, Appendix V valve lineup performed during 1979 although the valve lineup sheet was signed as complete by the Shift Supervisor:

- (1) OG-8, DOP Generator Discharge
- (2) SRS-8, Stack Gas II Vent

- AP 0001, Plant Procedures, which defines the categories of plant procedures states, in part, "Operating Procedures (OP) These procedures describe a sequence of steps to be performed to properly operate some equipment, a component, a system or a combination of systems. Operating Procedures are required for ... all Safety Class Systems as listed in YOQAP-1A [Appendix E] ... [and] will be ... reviewed by the PORC ... Routine Procedures (RP) These procedures concern those areas of plant operation not covered by Operating Procedures and encompass nonsafety related plant systems ... [and] will be reviewed by the PORC ... Department Procedures (DP) These procedures affect only the originating department and include such subjects as: operation of department equipment, test methods, ... schedules ... logs ... and recordkeeping. [DPs do not require review by the PORC]."

Contrary to the above, the following procedures, which by definition, should have been issued as OPs or RPs were incorrectly issued as DPs and, in addition, did not receive PORC review:

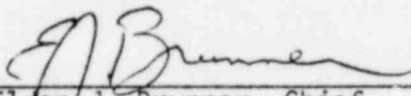
- (1) DP 1412, Jet Pump Inspection. This is a safety class component listed in YOQAP-1A, Appendix E.
- (2) DP 2430, High Density Fuel Rack Boral Test. This is a safety class component listed in YOQAP-1A, Appendix E.
- (3) DP 2445, IRM Calibration to Heat Balance. This is a safety class system listed in YOQAP-1A, Appendix E.
- (4) DP 5334, TIP Shear Valve Squib Charge Replacement. This is a nonsafety class system outside of the scope of the definition of DPs.

Further examples are detailed within the enclosed inspection report.

This is a Severity Level VI violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Vermont Yankee Nuclear Power Company 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) admission or denial of the alleged violations; (2) the corrective steps which have been taken and the results achieved; (3) corrective steps which will be taken to avoid further violations; and (4) 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 12 FEB 1981

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