

# YANKEE ATOMIC ELECTRIC COMPANY

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February 24 1990  
BYR 90-020

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

References: (a) License No. DPR-3 (Docket No. 50-29)  
(b) Letter, USNRC to YAEC, dated January 26, 1990,  
"Inspection Report No. 50-029/89-20"

Subject: Reply to Notice of Violation

Dear Sir:

Reference (b) documents a routine resident safety inspection conducted by H. Eichenholz and M. Markley on November 7, 1989 through January 2, 1990 at the Yankee Nuclear Power Station, Rowe, Massachusetts. The report identifies an activity that was not conducted in full compliance with the NRC requirements. The activity was identified as a Severity Level IV violation. In accordance with 10CFR2.201, we hereby submit the following information:

## Violation

10 CFR 50, Appendix B, Criterion XV specifies that measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. It further specifies that nonconforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures. Procedure AP-0207, Rev. 8, "Equipment Control," specifies in step II.A.7.c., that in cases where required documentary evidence is not available, the associated equipment or materials shall be considered nonconforming. Procedure AP-0212, Rev. 16, "Control of Purchased Material, Equipment and Services," requires in step II.A.4., that documentary evidence that items conform to procurement requirements shall be available prior to installation or use of such items where required by code, regulation or contract requirements. Procedure AP-0206, Rev. 10, "Nonconformance Report," requires in discussion step No. 4, nonconforming materials, that parts or components which depart from specified requirements that render the quality of an item unacceptable shall be reported under a Nonconformance Report (NCR). Procedure AP-0206 further specifies in step A.11, that the Licensee may authorize the materials or services in question to be placed in service, on a permanent or temporary basis, after the NCR is approved.

Contrary to the above on November 8 and 9, 1989, the licensee installed nonconforming, commercial grade A194-2H fasteners (hexagonal nuts) on the No. 2 and No. 3 charging pump strainers (Safety Class 2) without the required documentary evidence of conformance. Further, the use of nonconforming materials was allowed to occur without the required approved NCR.

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## Response

We concur with the Notice of Violation as described above and in Reference (b).

On November 1, 1989, Maintenance Request (MR) No. 89-2106, "Charging Pumps No. 1, 2 and 3 Strainers" was initiated for the performance of charging pump strainer cleaning and fastener replacement. The charging pumps and strainers are classified as Safety Class 2 (SC-2).

For this maintenance activity, the fasteners were obtained from the stockroom "hold area" with hold tags attached. The hold tags had been applied since the fasteners were originally purchased for another application and were commercial grade, non-nuclear safety (NNS) class A194-2H hexagonal nuts. The subject fasteners were being maintained in the "hold area" pending testing and documentation to upgrade the safety classification from NNS to SC-1. The materials certification process had been initiated, however, at the time of the fastener issuance and installation, the material test results and documentation supporting the classification upgrade had not been received.

On November 7, in accordance with plant procedures AP-0206, "Nonconformance Report" and AP-0222, "Job Orders," maintenance supervision obtained authorization (signature on QC hold tags) from the Acting Plant Superintendent to remove the fasteners from the stockroom for installation in the charging pump strainers. Contrary to the requirements of procedures AP-0206 and AP-0222, a nonconformance report (NCR) was not generated nor approved prior to the authorization for use of the fasteners; this resulted in the issuance of material with QC hold tags that had no affiliation with an NCR.

Maintenance personnel completed the installation work and the No. 2 and No. 3 charging pumps were returned to service with hold tags applied on November 8 and 9, respectively. Contrary to the requirement of procedure AP-0212, "Control of Purchased Material, Equipment and Services," hardness testing of the fasteners was not conducted prior to installation. On November 20, YAEC received material test results and documentation justifying the safety classification upgrade to SC-1.

## Corrective Actions to Prevent Recurrence

1. NCR 89-21 was initiated on December 22, 1989 to address this condition. The disposition included accepting the installed material "as is," since the fasteners were upgraded to SC-1 and were acceptable for use. The procedural requirements of AP-0206 concerning issuing and placing nonconforming material in service has been reemphasized to appropriate plant personnel. Additionally, the involved personnel have been retrained in the process of upgrading the safety classification of components, and reminded that adequate information and/or documentation must be obtained to justify its use prior to installation in a safety-related application.
2. Programmatic procedures will be evaluated to determine if changes are warranted to better delineate the method for controlling nonconforming material that is released for use. This evaluation will consider the observations and recommendations of the surveillances conducted by the

Quality Services Group. The evaluation will be completed and necessary training implemented prior to the upcoming refueling outage (6/23/90).

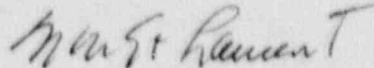
**Date of Full Compliance**

Full compliance with plant procedures was achieved in the preparation and disposition of NCR No. 89-21. Training of involved plant personnel was conducted in February, 1990. As stated previously, an evaluation of programmatic procedures will be performed and necessary training implemented prior to June 23, 1990.

If you have any questions or desire additional information, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



N. N. St. Laurent  
Acting Manger of Operations

NNS/pkg

CC: USNRC Region I  
USNRC Resident Inspector, YNPS  
William V. Johnston  
Acting Director, Division of Reactor Safety  
USNRC Region I