

VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET
RUTLAND, VERMONT 05701

B.4.1.1
WVY 80-129

REPLY TO:
ENGINEERING OFFICE
TURNPIKE ROAD
WESTBORO, MASSACHUSETTS 01581
TELEPHONE 617-366-9011

September 15, 1980

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

ATTENTION: Office of Inspection and Enforcement
Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch

REFERENCES: (a) License No. DPR-28 (Docket No. 50-271)
(b) USNRC Letter to VYNPC, dated June 10, 1980
(Inspection Report 50-271/80-05)

Dear Sir:

SUBJECT: Response to I&E Inspection No. 80-05

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 alleged item of noncompliance was noted during an inspection conducted on April 28 - May 16, 1980, at the Vermont Yankee Nuclear Power Station in Vernon, Vermont. Information is submitted as follows in answer to the alleged infraction item contained in the enclosure to your letter.

Item: Technical Specification 6.5.B.1 requires, in part, that "...each high radiation area in which the intensity of radiation is 1000 mRem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit. Any individual or group of individuals permitted to enter such areas shall be provided with one or more of the following:...a radiation monitoring device that continuously indicates the radiation dose rate; ...a radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a present integrated dose is received; ...a health physics qualified individual ...who is responsible for providing positive control over activities in the area."

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Plant Procedure, A.P. 0503, required under Procedure Section 3.B, that all accesses to a High Radiation Area be barricaded and entry thereto be permitted only to properly authorized personnel with a Radiation Work Permit.

Contrary to the above, on May 6, 1980, at 11:30 am, the inspector observed two individuals on the 280' elevation of the Reactor Building working inside an area posted and barricaded as a High Radiation Area, without a Radiation Work Permit to cover their activities. Additionally, neither a radiation dose rate device, a radiation dose integrating device, nor a health physics qualified individual was present to control activities in the area. Radiation dose rates in the area, as measured by the inspector, varied from 1200 mRem/hr on contact with a process line within the barricaded area to 80 mRem/hr at 3 feet from the process line.

Response:

The subject High Radiation Area is a process line running vertically from floor to ceiling. The observed individuals were installing conduit in the ceiling area and failed to identify their entrance into the High Radiation Area.

Upon discovery of this situation, the following actions were immediately taken:

1. Proper radiological controls were established and more conspicuous posting and barricading was provided around the process line.
2. The workers were reinforced of proper radiological controls to be taken within the radiological control area.

In addition, the following subsequent actions were taken to minimize the possibility of a recurrence of this type of situation.

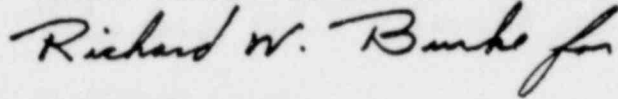
1. All plant personnel were informed that any work within the radiological control area that requires work in an overhead area (via ladders, staging, etc.) will require Health Physics review prior to initiation of work.
2. This same instruction was also incorporated into the indoctrination program for all new employees or contractors.

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We trust this information to be satisfactory. Should additional information be required, please feel free to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION



William F. Conway
Vice President and Manager of Operations

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