VERMONT YANKEE NUCLEAR POWER CORPORATION



RD 5, Box 169, Ferry Road, Brattleboro, VT 05301

FVY 83-63 2.C.2.1

REPLY TO

ENGINEERING OFFICE 1671 WORCESTER ROAD FRAMINGHAM, MASSACHUSETTS 01701 TELEPHONE 617-672-8100

June 23, 1983

U.S. Nuclear Regulatory Commission Region I 631 Park Avenue King of Prussia, PA 19406

> a) b)

Attention: Mr. R.W. Starostecki, Director Division of Product and Resident Programs

References:

License No. DPR-28 (Docket No. 50-271) USNRC Letter to VYNPC, dated May 24, 1983 and Inspection Report 50-271/83-01

Dear Sir:

Subject: Response to IE Inspection No. 83-01

This letter is written in response to Reference (b), which indicates that certain of our activities were not conducted in full compliance with Nuclear Regulatory Commission requirements. These alleged Level V violations were identified as a result of a routine inspection conducted by your Mr. W.J. Raymond during the period January 4-31, 1983.

Item:

Technical Specification 6.5.A requires that written procedures governing plant normal operations be prepared and followed. Procedure OP 2115, Primary Containment, Revision 11, was developed pursuant to the above and specifies the plant system valve configurations required to establish and maintain primary containment integrity during operation at power. Appendix C of OP 2115 requires that: 1) the 1 inch diameter test line for valve SB 16-19-7B be isolated and capped, and 2) that the root isolation valve (AC 60C) for drywell pressure switches PS-10-100C and 101C be fully open. Contary to the above, during plant operations at power, the SB 16-19-7B test line was found isolated but not capped at 3:30 PM on December 8, 1982, and root isolation valve AC 60C was found throttled half open at 4:30 PM on January 27, 1983.

Response:

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Upon notification of the nonconforming system configuration, operators installed a cap on the 1 inch test line for valve SB16-19-7B and positioned root isolation valve AC-60C to the full-open position. Additionally, in order to assure that the remainder of the containment penetration isolation valves conformed to the specified lineup, the entire Appendix C of OP 2115 U.S. Nuclear Regulatory Commission June 23, 1983 Page 2

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was verified. During this verification, no further discrepancies were found. In order to avoid further violations of this nature, a copy of the Notice of Violation was forwarded to the Shift Supervisors and Supervisory Control Room Operator with instructions from the Operations Supervisor to reinstruct operations personnel in the importance of correct system lineups. A copy of the response to the Notice of Violation will be included in the Night Order Book upon issue of the response.

Item:

Technical Specification 6.0 states that Administrative Controls are written procedures and instructions established by management to obtain assurance of safety and requires that administrative controls be followed. Administrative Procedure AP 1500, Revision 10, specifies the health physics surveys to be performed during new fuel receipt inspections. Procedure Section 4.b requires, for each fuel element, that an alpha survey be made in direct contact with the fuel rods on all four sides over the full length of the element.

Contrary to the above, the instruction of AP 1500 were not followed during receipt inspections of fuel elements LY 4789 and LY 4790 on January 27, 1983, in that alpha surveys were completed only on then accessible portions of the up-ended fuel elements, covering about the lower third of the fuel element.

Response:

This failure to fully comply with the survey requirements of AP 1500 resulted from a misunderstanding of those requirements on the part of the technicians involved. Upon notification of the deficiency, Chemistry and Health Physics Department personnel involved in new fuel receipt inspection were verbally re-instructed in the requirements of AP 1500. In addition, department personnel will receive formal re-instruction in this procedure prior to its next use. This violation will be covered as a part of that re-instruction.

We trust that this information will be satisfactory; however, should you have any questions or desire additional information, please contact us.

Very truly yours.

VERMONT YANKEE NUCLEAR POWER CORPORATION

R.W. Buck for

Warren P. Murphy Vice President and Manager of Operations

WPM/dm