## YANKEE ATOMIC ELECTRIC COMPANY

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April 23, 1990

BYR 90-57

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, "Inspection Report No. 50-029/89-80," dated February 16, 1990

Subject:

Response to List of Identified Items in Inspection Report

No. 50-029/89-80

Dear Sir:

Reference (b) documents a special team inspection of the emergency procedures conducted on November 6 through 14, 1989 at the Yankee Nuclear Power Station, Rowe, Massachusetts. Reference (b) requested that Yankee Atomic respond to the identified concerns summarized in Attachment 3 to the inspection report. Yankee Atomic's response to each of the items is provided below:

Item No. 89-80-01: Develop and implement off-normal Operating Procedure (OP)

to address an SGTR that is greater than Technical Specification but less than make-up capability.

Response: Appropriate plant procedures were implemented on

February 14, 1990 to address this concern. This item can

be considered closed.

Item No. 89-80-02: Upgrade Deviation Justification documentation to more

fully detail justification for deviations.

United States Nuclear Regulatory Commission Attention: Document Control Desk

Response:

Response: These actions will be completed prior to restart from the Core 21 refueling outage.

Item No. 89-80-03: Review EOPs to determine conformity with Writer's Guide (WG) and correct identified deficiencies.

Response: These actions will be completed prior to restart from the Core 21 refueling outage.

Item No. 89-80-04: Correct in-plant labeling of equipment associated with the performance of EOPs, Off-Normal OPs and procedures directly referenced from EOPs.

Response:

Identification of in-plant and in-Control Room labeling needs have been completed. Except for containment and rotating equipment, the in-plant corrections have been implemented. Control Room changes await final review and approval. In all cases, the corrections will be completed prior to restart from the Core 21 refueling outage.

Item No. 89-80-05: Review level of detail of EOPs and their attachments and the deficiencies identified in Attachment 2 of this report and incorporate appropriate changes.

Response: These actions will be completed prior to restart from the Core 21 refueling outage.

Item No. 89-80-06: Develop and implement an EOP maintenance program and an objective means to determine the level and type of operator training required to address revisions to EOPs.

Response: These actions will be completed prior to April 30, 1990.

Item No. 89-80-07: Perform in-plant walkdowns of <u>all</u> Off-Normal OPs and EOP attachments and <u>all</u> procedures directly referenced from the EOPs.

Revise AP-0001 to require in-plant walkdowns of OPs during their biennial review.

All Off-Normal OPs and procedures directly referenced from the EOPs have received in-plant walkdowns. These actions were completed prior to February 28, 1990. In-plant walkdowns of EOP attachments will be completed prior to restart from the Core 21 refueling outage. AP-0001 has been revised to require in-plant walkdowns of OPs during their biennial review.