YANKEE ATOMIC ELECTRIC COMPANY

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2.C.2.11

FYR 81-121

August 7, 1981

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attention: Office of Inspection and Enforcement
Mr. Boyce H. Grier, Director

References: (a) License No. DPR-3 (Docket No. 50-29)

(b) I & E Letter to YAEC, dated July 16, 1981
I & E Inspection Report 50-29/81-06

Dear Sir:

Subject: Response to Inspection

Reference is made to I & E Inspection No. 50-29/81-06, which was conducted by Messrs. T. Foley and A. A. Varela, of your office, on April 1 - May 30, 1981, at the Yankee Nuclear Power Station (Yankee Rowe) in Rowe, Massachusetts. The report made subsequent to that inspection identified two items which apparently were not conducted in full compliance with NRC requirements. In accordance with Section 2.201 of the NRC's "Rules and Practices", Part 2 Title 10 Code of Federal Regulations, we hereby submit the following information.

Alleged Violation

Technical Specification 6.12.1 Paragraph 20.203, "Caution Signs, Labels, Signals, and Controls", states that, "In lieu of the "control device" or "alarm signal" required by Paragraph 20.203(c)(2), 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. An individual or group of individuals permitted to enter such areas shall be provided with one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area have been established and personnel have been made knowledgeable of them.

c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and who will perform radiation surveillance frequency will be established by the Plant Health Physicist.

The above procedure shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the key shall be maintained under the administrative control of the shift supervisor on duty and/or the Plant Health Physicist."

Contrary to the above, on May 14, 1981, the vicinity of the Main Coolant Isolation Valve Stem Leak-Off drain line, (located in the Vapor Container) an area accessible to personnel having doses rate in excess of 1000 millirem per hour, was not provided with lock doors. Actual measured dose rates revealed 12000 millirem per hour at contact and 1200 millirem per hour, general area. No other controls were established to prevent unauthorized entry to the area.

Response

Corrective Steps Taken and Results Achieved

Upon notification of the violation the area was immediately resurveyed and shielding was installed to reduce the levels of radiation to less than 1000 mrem/hr. Health Physics personnel were reinstructed to shield "hot spots" or restrict personnel access to the area, as applicable.

Corrective Steps Taken to Avoid Further Violations

In the future, emphasis will be placed on conducting surveys of lines and components in all areas to locate areas of high radiation and to provide shielding or restrict access to the area as required.

Date When Full Compliance was Achieved

Full compliance was achieved on May 14, 1981.

Alleged Violation

10 CFR 50, Appendix B, Criteria V, states in part, that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures or drawings..."

Yankee Atomic Electric drawing number SPD-0006-CF-1002, Revision 6A and Mercury Corporation Specification SP-N49855-703 require cement grout to satisfy the specified compressive strength of 4,000 psi.

Contrary to the above, during April 1981, the grout material, used around the installed rock anchors in the reactor column bases was not tested to show compliance with the minimum compressive strength required by Yankee Atomic drawing number SPD-0006-CF-1002, Revision 6A and Mercury Corporation Specification SP-N49855-703.

Response

We feel that the alleged Item of Noncompliance is incorrect and we, therefore, request that the Item of Noncompliance be withdrawn.

We base this upon the following information:

1. The Will-X cement grout is a proprietary item of Williams Rockbolt Company.

2. The manufacturer's instructions addressed the method of mixing and curing the grout so as to provide a compressive strength of 4000 psi. These instructions were adhered to during the application of the cement grout.

3. A Certificate of Compliance was provided by the vendor stating that the product shipped was what was ordered and therefore will perform as intended.

4. The grout was used only to fill the void around the installed rock anchors and was not required to provide any additional support based on the analysis performed.

We trust this information is satisfactory, however, should you desire additional information please feel free to contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

L. H. Heider
Vice President

COMMONWEALTH OF MASSACHUSETTS)
)ss
MIDDLESEX COUNTY)

Then personally appeared before me, L. H. Heider, who, being duly sworn, did state that he is a Vice President of Yankee Atomic Electric Company, that he is duly authorized to execute and file the foregoing request in the name and on the behalf of Yankee Atomic Electric Company, and that the statements therein are true to the best of his knowledge and belief.

Robert H. Groce Notary Public
My Commission Expires September 14, 1984