

YANKEE ATOMIC ELECTRIC COMPANY

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BTR 90-49

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

References: (a) License No. DPR-3 (Docket No. 50-029)
(b) Letter, USNRC to YAEC, Inspection Report No. 50-29/90-02,
dated March 13, 1990

Subject: Reply to Notice of Deviation

Dear Sir:

Reference (b) documents a special inspection of the post-accident monitoring instrumentation conducted by Mr. R. K. Mathew and Mr. T. Koshy on February 5 through February 9, 1990 at Yankee Nuclear Power Station, Rowe, Massachusetts. This letter identifies a deviation from Regulatory Guide 1.97, Revision 3, Table 1, Section 8. Accordingly, we submit the following response:

Notice of Deviation

Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," Revision 3, Table 1, Section 8, states the following, "Equipment Identification-Type A, B, and C instruments designated as Categories 1 and 2 should be specifically identified with a common designation on the control panels so that the operator can easily discern that they are intended for use under accident conditions."

Contrary to the above, Reference (b) identified that on February 9, 1990, the Control Room panels did not have specific identification of post-accident monitoring instrumentation as required by Regulatory Guide 1.97.

Response

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

During the implementation of an engineering design change in the spring of 1987, all Control Room labels were replaced as part of the human engineering upgrade of the Control Room, as a result of the Control Room design review activities. The new labels included a symbol to identify the environmentally qualified instruments in the Control Room under the Environmental Qualification Program. As identified during the Regulatory Guide 1.97 inspection, Reference (b), this identification was not applied to all Type A, B, and C instruments designated as Categories 1 and 2.

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Corrective Actions To Be Taken

A listing of the Yankee plant Type A, B, C, D, and E instruments designated as Categories 1, 2, and 3 will be formalized as part of a Regulatory Guide 1.97 report. This report will include a history of licensing correspondence applicable to Yankee. New labels will be provided for the Type A, E, and C instruments, Categories 1 and 2, based on this report listing.

Corrective Actions To Prevent Recurrence And To /Avoid Further Deviations

The Regulatory Guide 1.97 report will become a controlled document. Each design change and several plant procedures will be required to address the document for changes or potential conflict. The Regulatory Guide 1.97 report will be updated on an "as needed" basis.

Date of Full Compliance

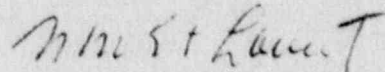
The Control Room labels will be corrected prior to startup from the Core 20/21 refueling presently scheduled as August 1990.

Full compliance with the deviation identified in Reference (b) and discussed above, will be completed by the end of December 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 Manager of Operations

NNS/gjt/WPP74/22

cc: USNRC Region I
USNRC Resident Inspector, YNPS
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