

# YANKEE ATOMIC ELECTRIC COMPANY

2.C.2.1  
FYR 82-74



1671 Worcester Road, Framingham, Massachusetts 01701  
July 1, 1982

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

Attention: Mr. Ronald C. Haynes, Regional Administrator  
Region I

References: (a) License No. DPR-3 (Docket No. 50-29)  
(b) I&E Letter to YAEC dated June 4, 1982, I&E Inspection  
Report No. 82-07

Subject: Response to Inspection No. 50-29/82-07

Dear Sir:

Reference is made to I&E Inspection No. 82-07 conducted by your Mr. Glenn W. Meyer on May 4-7, 1982 at the Yankee Atomic Electric Company Nuclear Power Station in Rowe, Massachusetts. The report made subsequent to that inspection identified one item that apparently was 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

10 CFR 50, Appendix B, Criterion XVI, states, in part, "Measures shall be established to assure that conditions adverse to quality...are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

The Yankee Operational Quality Assurance Program (YOQAP-I-A) commits Yankee Atomic Electric to meet ANSI N45.2.12, Draft 4, Rev. 2, January 1, 1976. ANSI N45.2.12 states in Paragraph 4.5.1 "Management of the audited organization or activity shall review and investigate any adverse audit findings to determine and schedule appropriate corrective action including action to prevent recurrence..."

Contrary to the above on May 7, 1982, it was found that in the following instances the licensee audit program identified significant conditions adverse to quality for which no cause was determined and no corrective action was taken to preclude repetition. The conditions adverse to quality did repeat and were identified again in subsequent licensee audits.

1. During Audit YR-81-4, Security, completed on September 11, 1981, the auditor found a locked gate of the protected area fence that could be opened without unlocking it. The corrective action was to put a chain with a lock on the gate. There was no determination of cause and no action taken to preclude repetition. During Audit YR-82-4, Security completed on April 30, 1982, the auditor found another locked gate of the protected area fence that could be opened without unlocking it.

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2. During Audit YR-81-4, Security, the auditor found that the owner controlled area was not properly posted with "No Trespassing" signs in one region. The corrective action was to replace the signs in the one region. There was no corrective action taken to preclude repetition. In Audit YR-82-4, the auditor found that the owner controlled area was not properly posted with "No Trespassing" signs in another region.
3. During Audit YR-80-2, Chemistry, completed on May 14, 1980, the auditor found four chemical reagents that had incorrect expiration dates, had exceeded the expiration dates, or had no expiration dates. Audit Report YR-80-2 stated that "The auditors feel there is a need for tighter controls of the prepared reagents". The corrective action was to discard the expired reagents. There was no determination of cause and no action taken to preclude repetition. During Audit YR-81-2, Chemistry completed on March 13, 1981, the auditor found "some chemicals and reagents being stored in the Primary and Secondary Labs have exceeded their shelf life."

1) Corrective Steps Taken and Results Achieved

On June 28, 1982, a meeting was held between Plant Management, the Manager of Operational Quality Assurance, the Operational Quality Assurance Coordinator and the Operation's Support Engineer to discuss and evaluate the methods used by the plant in responding to items identified by the in-plant audit program which are significant conditions adverse to quality. As a result of this meeting, the following corrective steps will be taken.

2) Corrective Steps Will Be Taken To Avoid Further Violations:

Plant Management will 1) re-emphasize the need for comprehensive corrective action planning to the plant staff and 2) review plant procedures and revise, as appropriate, to insure that items identified by the in-plant audit program will be addressed by a comprehensive corrective action plan to preclude repetition. Plant Management will also establish a timeframe for resolution of outstanding items identified in the in-plant audit program unless resolution is required by Manager of Operations. Operational Quality Assurance will also enter all outstanding audit items into their outstanding item tracking system upon issuance of the in-plant audit report.

3) Date When Full Compliance Will Be Achieved

Staff re-emphasis on comprehensive corrective action planning will be achieved by July 31, 1982. Procedure review and revision, as appropriate, will be completed by August 31, 1982.

Reference (b) also requested response to unresolve item (29/82-07-02), in addition to the above response to the Notice of Violation.

Response

At the meeting of June 28, 1982, the subject of the timeliness of responses to audit findings was also discussed, and it was concluded that in the future the time frame for Plant Position Report and Manager of Operations Implementation

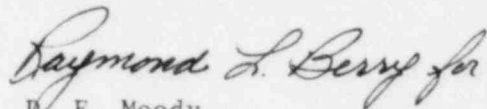
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Directive will meet the ANSI N45.2.12 requirement of "thirty days". However, our interpretation of the "thirty days" for audit reporting and response to the audit findings is thirty working days and not thirty calendar days.

Should you have any questions or desire additional information, please feel free to contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



D. E. Moody  
Manager of Operations

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