



EDISON DRIVE
AUGUSTA, MAINE 04336
(207) 623-3521

June 11, 1982
MN-82-111

JHG-82-102

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

Attention: Mr. Ronald C. Haynes, Director

References: (a) License No. DPR-36 (Docket No. 50-309)
(b) Letter from USNRC to MYAPCo dated April 21, 1982
Inspection 50-309/82-04

Subject: Response to Inspection No. 50-309/82-04

Dear Sir:

This letter is in response to Reference (b). We have addressed the specific violations identified in Inspection 82-04 and have indicated the corrective actions taken to achieve compliance in those instances.

As you indicated in Reference (b), these violations are viewed as symptomatic of problems in the general area of control and review of safety related activities. Therefore, we have attempted to identify the underlying problems and take appropriate remedial measures to reduce the probability of reoccurrence.

In addition we are conducting a review of our management control systems to identify procedural and programmatic weaknesses. We expect that additional corrective measures will be implemented as a consequence of this review.

United States Nuclear Regulatory Commission
Attention: Mr. Ronald C. Haynes, Director

June 11, 1982
Page 2

Responses to the violations are provided below:

Item of Non-Compliance - Appendix A - Para. A

1. Inadequate design or document review was evident in the following case:
"An approved engineering drawing, No. 11550-FE-3DM, was incorrect in that the drawing required the wiring of a logic circuit associated with Engineering and Design Change Request (EDCR) 82-7 in a manner such that the logic circuit would not function properly. Further, additional drawings associated with EDCR 82-7 were required to be revised to reflect the correct as built condition of the circuitry."

Response:

The root cause of the FE drawing discrepancies has not been definitely determined. However, our program and the ANSI standard it references did not require a point by point wiring check at the 100% coverage level. Point by point wiring checks and logic checks at the 100% coverage level will be instituted by August 1, 1982.

In the process of executing the installation instructions associated with this particular change, a deviation was properly identified, the work was held up, and the deviation was properly resolved in accordance with our engineering control procedures.

This incident indicates a need for verification of as built drawings used in developing installation instructions. Therefore, procedural changes have been instituted to require engineering field verification of as built information prior to start of installation. This verification includes the affected portions of every drawing used in developing the installation instructions.

United States Nuclear Regulatory Commission
Attention: Mr. Ronald C. Haynes, Director

June 11, 1982
Page 3

Item of Non-Compliance - Appendix A - Para A (Con't)

2. Inadequate design or document review was evident in the following case:
"Approved engineering drawings/instructions associated with the High Range Radiation Monitors installed per EDCR 80-03 did not accurately indicate the installation of the High Range Radiation Detectors. Further, the drawings/instructions did not correctly indicate the installed wiring location from the detectors to the containment penetration and auxiliary logic cabinets."

Response:

A requirement for review of changes to installation instructions by the same organizational entities that reviewed the original instructions have been instituted. Also, as discussed in the response to Item #1, Para. A above, a requirement for point to point wiring and logic check at the 100% coverage level during design review is being instituted.

Prior to plant startup, the installation of the high range containment monitors was determined to have been in conformance with the EDCR 80-3. Plant controlled drawings are being revised in accordance with engineering procedures to reflect EDCR 80-3 as built.

During development and revision of the EDCR 80-3 design and installation instructions errors were introduced. These errors were corrected during final installation. The errors were the result of inadequate review of instructions and changes to instructions. Administrative controls have been implemented that require the lead engineer in each discipline to review, in detail, installation instructions and changes thereto in his discipline to ensure their adequacy and correctness.

As best we can determine, the question about the correct elevation for detector installation arose because a drawing showing the detector elevation 8 ft above the floor was reviewed by the inspector. However, that drawing at the time of the inspector's review had been rendered obsolete by a properly executed engineering change notice (ECN 6) which revised the installation elevation to 11 ft above the floor, where the detectors were installed.

United States Nuclear Regulatory Commission
Attention: Mr. Ronald C. Haynes, Director

June 11, 1982
Page 4

Item of Non-Compliance - Appendix A - Para. B

An "on duty" Senior Reactor Operator had not documented his authorization to remove equipment from service by signing the Maintenance Request in the appropriate section in two separate instances.

Response:

The maintenance requests involved were signed by the on duty Senior Reactor Operator immediately upon discovery of this deficiency.

The maintenance request form is being revised to arrange the signature blocks and provide instructions that work will not be initiated until the required signatures are in place. In addition, Procedure 0-07-03 is being revised to add a step requiring the personnel responsible for work to verify that the required maintenance request form signatures are present before initiating work. The procedure will be revised and approved by August 15, 1982, and the form will be revised, printed and in use prior to the 1982 refueling outage.

United States Nuclear Regulatory Commission
Attention: Mr. Ronald C. Haynes, Director

June 11, 1982
Page 5

Item of Non-Compliance - Appendix A - Para. D

The test procedure associated with the SIAS Modification performed per EDCR 82-7 was not reviewed by the PORC or approved by the Plant Manager.

Response:

The SIAS test was conducted in accordance with test instructions prepared pursuant to procedure 0-06-3 "Preoperational, Operational, and Special Tests and Experiments". This procedure had previously been reviewed by the Plant Operations Review Committee and approved by the Plant Manager.

Procedure 0-06-3 permits test instructions which are not sufficiently involved to require detailed test procedures (such as valve stroking, relay firing, etc.) to be developed and implemented without PORC review and approval. In our view, this approach strikes an appropriate balance between assuring proper performance and burdening the PORC

However in this case, the test instructions were reviewed and approved by PORC and the Plant Manager in accordance with the wishes of the NRC inspector.

At the time of this inspection, procedure 0-06-3 did not require review of test instructions by another member of the engineering staff. Since then, it has been decided that a review of test instructions by the cognizant supervisor should be provided. Procedure 0-06-3 has been revised to add a step requiring engineering review of test instructions, and the test instruction form is being revised to provide documentation of this review. The procedure revision will be implemented by July 30, 1982.

We believe engineering review is an acceptable alternative to the specific steps suggested in the inspection report. We also believe this alternative is acceptable from the perspective of ANSI 45.2.11 which is endorsed by our QA Program topical. We further believe that this is a prudent approach to ensuring the requirements of 10CFR50, Appendix B, Criterion VI are met.

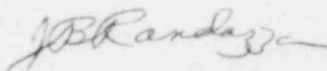
United States Nuclear Regulatory Commission
Attention: Mr. Ronald C. Haynes, Director

June 11 1982
Page 6

We trust this response is satisfactory. Should you have any further questions, please feel free to contact us.

Very truly yours

MAINE YANKEE ATOMIC POWER COMPANY

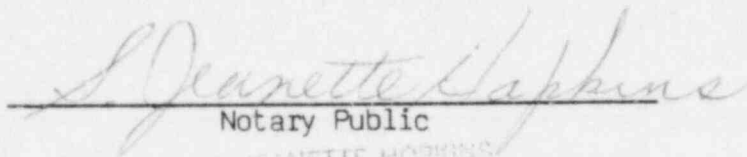


J. B. Randazza
Vice President

JBR:pjp

STATE OF MAINE)
)SS
COUNTY OF KENNEBEC)

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



Notary Public
JEANNETTE HOPKINS
NOTARY PUBLIC STATE OF MAINE
MY COMMISSION EXPIRES
MAY 1, 1988