

Maine Yankee

RELIABLE ELECTRICITY SINCE 1972

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January 17, 1994
MN-94-07 JRH-94-12

UNITED STATES NUCLEAR REGULATORY COMMISSION
Attention: Document Control Desk
Washington, DC 20555

References: (a) License No. DPR-36 (Docket No. 50-309)
 (b) USNRC Letter to MYAPCo dated December 17, 1993, "Notice of
 Violation (NRC Inspection No. 50-309/93-23).
 (c) MYAPCo Letter to USNRC dated December 2, 1993, "Maine Yankee
 Licensee Event Report 93-021: CEA Position Deviation Alarms
 Disabled", MN-93-109.

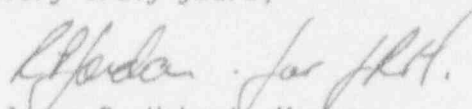
Subject: Response to Notice of Violation (NRC Inspection No. 50-309/93-23): CEA
 Position Deviation Alarms Disabled

Gentlemen:

The Attachment to this letter responds to the Notice of Violation contained in Reference (b). In this Attachment, we have restated the violation and provided our response. We have addressed our actions taken and those planned to prevent recurrence.

Please contact us should you have any questions regarding this matter.

Very truly yours,



James R. Hebert, Manager
Licensing and Engineering Support

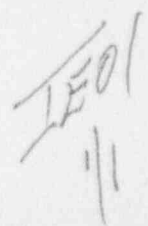
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Attachment

c: Mr. Thomas T. Martin
 Mr. J. T. Yerokun
 Mr. E. H. Trottier
 Mr. Patrick J. Dostie

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ATTACHMENT

Notice of Violation:

During a NRC inspection conducted on October 12 to November 12, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 3.10.A.4, states, in part, that if the CEA deviation alarms from both the computer pulse counting system and the reed switch indication system are not available, individual CEA positions shall be logged and misalignment checked every 4 hours.

Contrary to the above, on November 4, 1993, the CEA deviation alarms from both the computer pulse counting system (PANALARM R-1-7u) and the reed switch indicating system (PANALARM R-2-3) were inoperable, and had apparently been in that condition since the plant startup on October 9, 1993, without individual CEA positions being logged and misalignment checked every 4 hours.

Maine Yankee Response:

As described in the Licensee Event Report 93-021, Reference (c) and the NRC Inspection Report No. 50-309/93-23, Reference (b), the CEA deviation alarms from both the reed switch indicator and the computer pulse counting system were inoperable from the time of Cycle 14 startup, October 9, 1993, to November 4, 1993. Compensatory measures as provided in the Maine Yankee Technical Specification 3.10.A.4 were not in effect during this period.

On November 4, 1993, Maine Yankee Control Room Operators (CROs) were preparing to commence the monthly surveillance on Control Element Assembly (CEA) exercising in accordance with the procedure 3.1.8, "CEA Exercising". This was the first such CEA monthly surveillance following the startup of the reactor for Cycle 14 operations on October 9, 1993. In reviewing the prerequisites of this procedure, it was noted that the reed switch CEA deviation alarm was already annunciated due to a previously identified intermittent spurious alarm signal associated with the CEA Regulating Group 5A. This condition rendered the alarm incapable of annunciating upon receipt of any subsequent reed switch CEA deviation alarm condition; thus, the alarm was considered to be inoperable. This condition is acceptable in accordance with Technical Specification requirements. In proceeding with the procedure 3.1.8, the CROs inserted the first CEA five steps into the core. It was noted that both the reed switch and computer pulse CEA position indications were operational. However, it was also noted that the computer pulse CEA deviation alarm did not activate as would be expected. Further investigation indicated that the computer interlock relay cards for this alarming function were improperly maintained in the withdrawn position inside the computer cabinet. These cards had been in the withdrawn position for troubleshooting purposes, and thus inoperable, since the end of the most recent refueling outage in October, 1993.

The inoperability of both CEA deviation alarm systems is permitted provided that the individual CEA positions are logged and misalignment checks performed every four hours (Technical Specification 3.10.A.4). However, Maine Yankee failed to comply with the requirements of that specification.

Maine Yankee has determined that this lack of compliance with the requirements of Technical Specification 3.10.A.4 is the result of inadequate procedural controls associated with the computer interlock relay cards during troubleshooting operations.

Immediate Corrective Actions:

The following immediate corrective actions were taken:

- The interlock relay cards for the computer pulse CEA deviation alarming function were restored by the Computer Section personnel.
- Personnel from the I&C Section cleared the spurious alarm signal from the CEA Regulating Group 5A; thus, restoring the operability of the reed switch CEA deviation alarms.
- The alarm function of both the computer pulse counting system and reed switch CEA deviation system were verified operational.

Corrective Actions Taken To Avoid Further Violation:

To avoid further violations, the following long term corrective actions will be taken and completed by April 30, 1994:

- A warning notice will be affixed to the computer cabinet containing the interlock relay cards for the computer pulse CEA deviation alarming function which alerts the computer or I&C technicians to the administrative requirements governing the control of those cards.
- Enhanced administrative controls will be added to the appropriate procedures. As a minimum, the below listed procedures will be revised to ensure that the interlock relay cards have been properly replaced and to verify that the CEA alarms are operational when required.

1-2 Reactor Startup
3-6.2.1.19 Rod Drop Time Test and Functional Checks

Maine Yankee will also review other Operation Department, I & C Section, and Computer Section procedures to ensure that positive administrative controls exist for the handling of computer cards associated with the plant computer system.

- A new Class D procedure for the Computer Section will be instituted to proceduralize the performance of a full operational check of the process computer prior to reactor startup.

Full Compliance Date:

Full compliance was achieved on November 4, 1993, when the computer interlock relay cards were reinstalled in the computer and the CEA deviation alarm function was verified operable.