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Docket No. 50-271

Mr. Donald A. Reid Vice President, Operations Vermont Yankee Nuclear Power Corporation RD 5, Box 169 Ferry Road Brattleboro, Vermont 05301

Dear Mr. Reid:

SUBJECT: NRC INSPECTION REPORT NO. 50-271/94-04 - CONTROL ROOM VENTILATION SYSTEM INSPECTION

This letter refers to an announced safety inspection conducted by Mr. James Trapp and Mr. Michael Buckley of this office on January 3-7, 1994, at Vermont Yankee Plant in Vernon, Vermont. The inspection focused on the control room ventilation system. The results of this inspection were discussed with Mr. Robert Buteau and other members of your staff at the conclusion of the inspection.

Areas examined during this inspection are discussed in the enclosed inspection report. The inspection consisted of a review of plant procedures, surveillance testing, design change documentation, temporary modifications, and physical walkdown; of the control room ventilation system. The control room ventilation system is important because it is designed to maintain a habitable environment for personnel and control room equipment during a posturated accident.

The operating procedures for the control room ventilation system were detailed and technically sound. The plant design change documentation and safety evaluations for design changes made to the control room ventilation system were of high quality. The material condition of the control room ventilation equipment was acceptable. However, the inspectors noted that a tubing support was removed on a liquid refrigerant line without adequate documentation and a tear was identified in an exhaust boot of one of the control room ventilation fans. Actions were taken to correct these deficiencies prior to the conclusion of this inspection. A calculation was prepared by your technical staff which concluded that the liquid refrigerant line was adequately supported with the tubing support removed. The failure to document the removal of the tubing support is not being cited as a violation because the criteria specified in Section VII.B.2 of the NRC Enforcement Policy are satisfied.

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Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violation is a concern because the control room ventilation system is not routinely tested to verify that this system will perform its intended safety function when called upon to operate. In addition, an evaluation to establish appropriate measures to verify system operation had not been completed. This issue appears to be similar to the recent failure to establish appropriate measures to verify the operability of the alternate cooling system. The failure to routinely verify the operability of the alternate cooling system resulted in a silting condition which went undetected and ultimately resulted in this system not being able to perform its intended safety function. We are particularly concerned that evaluations have not been completed for establishing measures to verify that safety systems, which do not have explicit technical specification required integrated system functional surveillance tests, are maintained in a condition in which they are capable of performing their intended safety function.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. In addition, your reply to this Notice should address our broader concern for establishing appropriate measures to verify that safety-related equipment, that are not specifically addressed in the technical specification, remains functional. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room. The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By &

William Ruland for Jacque P. Durr, Chief Engineering Branch Division of Reactor Safety

- Enclosures: 1. Notice of Violation
 - 2. NRC Inspection Report 50-271/94-04

Vermont Yankee Nuclear Power Corporation 3

cc w/encl:

- R. Wanczyk, Plant Manager
- J. Thayer, Vice President, Yankee Atomic Electric Company
- L. Tremblay, Senior Licensing Engineer, Yankee Atomic Electric Company
- J. Gilroy, Director, Vermont Public Interest Research Group, Inc.
- D. Tefft, Administrator, Bureau of Radiological Health, State of New Hampshire
- Chief, Safety Unit, Office of the Attorney General, Commonwealth of Massachusetts
- R. Gad, Esquire
- G. Bisbee, Esquire
- R. Sedano, Vermont Department of Public Service
- T. Rapone, Massachusetts Executive Office of Public Safety

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Nuclear Safety Information Center (NSIC)

K. Abraham, PAO (2 copies)

NRC Resident Inspector

State of New Hampshire, SLO Designee

State of Vermont, SLO Designee

Commonwealth of Massachusetts, SLO Designee

bcc w/encl:

Region I Docket Room (with concurrences)

E. Kelly, DRP

J. Shedlosky, DRP

bcc w/encl (VIA E-MAIL):

V. McCree, OEDO

D. Dorman, NRR

W. Butler, NRR

M. Shannon, ILPB

RI:DRS Trapp 9~7 1/27/94 RI:DRS Buckley RI:DRS Durr

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