

JAN 04 1983

Docket No. 50-213

Connecticut Yankee Atomic Power Company
ATTN: Mr. W. G. Council
Senior Vice President - Nuclear
Engineering and Operations Group
P.O. Box 270
Hartford, Connecticut 06101

Gentlemen:

Subject: Inspection 50-213/82-14

This refers to your letter dated October 5, 1982, in response to our letter dated September 10, 1982.

Your letter of October 5, 1982 in response to an apparent item of noncompliance has been considered. We appreciate your calling to our attention the inaccuracies in our notice of violation.

The problem related to a maintenance activity for a safety-related component. Based on discussions between our staffs, the matter warrants your consideration because some of your staff characterized the issue as involving a minimal amount of work that is extremely simple in nature.

The issue involved the lack of a prepared maintenance procedure for conducting an overspeed test on an auxiliary feed pump turbine. Uncoupling the turbine from the pump to perform the test required special consideration. Station procedure M8.5-40 prohibited such an operation because cooling water for the turbine bearings is supplied by the pump. Also, the overspeed trip point is difficult to determine because of the difficulty in controlling the uncoupled turbine's rapid increase in speed. This apparently resulted in the failure of the initial test. Consequently, our conclusion is that this maintenance operation should be performed with written instructions for the following reasons:

1. The potential existed for affecting the performance of safety-related equipment; and,
2. Skills possessed by qualified maintenance personnel were not readily demonstrated to be adequate to the circumstances.

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Your reference to ANSI 18.7-1976 paragraph 5.2.7.1 is correct. Furthermore, you also stated that an approved, written procedure for this test has been implemented. Consequently, we are exercising our discretion in this matter and are correcting our records to show that our original citation has been withdrawn.

Your cooperation is appreciated.

Sincerely,

Original Signed By:

Richard W. Starostecki, Director
Division of Project and Resident
Programs

cc:

- R. Graves, Plant Superintendent
- D. G. Diedrick, Manager of Quality Assurance
- R. T. Laudenat, Manager, Generation Facilities Licensing
- J. F. Opeka, Vice President, Nuclear Operations
- Public Document Room (PDR)
- Local Public Document Room (LPDR)
- Nuclear Safety Information Center (NSIC)
- NRC Resident Inspector
- State of Connecticut

bcc:

- Region I Docket Room (with concurrences)
- DPRP Section Chief

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