



CONNECTICUT YANKEE ATOMIC POWER COMPANY

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DOCKET NO. 50-213
A02765

Richard Starostecki, Director
Division of Project and Resident
Programs
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

References: (1) Richard Starostecki Letter to W. G. Council
dated September 10, 1982 transmitting
I&E Inspection 50-213/82-14.

Gentlemen:

Haddam Neck Plant
Response to I&E Inspection 82-14

Pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, this report is submitted in reply to Reference (1) which informed the Connecticut Yankee Atomic Power Company (CYAPCO) of an apparent Severity Level IV Violation as a result of an item of non-compliance noted during the routine safety inspection conducted on June 10, 1982 through July 14, 1982.

Item

As a result of the inspection conducted June 10-July 14, 1982, and in accordance with the NRC Enforcement Policy, (10 CFR Part 2, Appendix C), 47 FR 9987 (March 9, 1982), the following violation was identified:

Technical Specification 6.8 states that procedures shall be established, implemented and maintained which meet or exceed ANSI 18.7-1976.

ANSI 18.7-1976, paragraph 5.1.6.1, states in part, that maintenance which can affect safety-related equipment shall be performed with approved written procedures.

Contrary to the above, on July 12, 1982, maintenance was performed on the "A" Auxiliary Feedwater Pump Turbine without an approved written procedure.

This is a Severity Level IV violation.

Response

On July 12, 1982, the Maintenance Department performed a test on the overspeed trip device on the "A" Auxiliary Feed Pump Turbine. The Operations Department ran the turbine using procedure SUR 5.1-13, which is their monthly operability verification procedure.

The NRC resident inspector observed this work in progress and stated that he felt we should have a procedure for performing this work.

The notice of violation dated September 10, 1982, makes reference to Section 5.1.6.1 of ANSI 18.7-1976, and points out that this section states in part, "That maintenance which can affect safety-related equipment shall be performed with approved written procedures." Although the general intent of this statement is covered in ANSI 18.7, these exact words do not exist and there is no Section 5.1.6.1. Mr. W. D. Bartron of my staff has discussed with Mr. L. E. Briggs of your staff the fact that Section 5.1.6.1 of ANSI 18.7-1976 does not exist. Mr. Briggs stated that the section of the standard that they intended to make reference to was the last sentence of paragraph 3 of Section 5.2.7.1. This section states, "Approved procedures shall be available for repair of safety-related equipment prior to the performance of such repairs (see also Section 5.2.2 and 5.2.7)." Section 5.2.7 states, "Maintenance or modification of equipment shall be preplanned and performed in accordance with written procedures, documented instructions or drawings appropriate to the circumstances which conform to applicable codes, standards, specifications and criteria." However, it also states that "Skills normally possessed by qualified maintenance personnel may not require detailed step-by-step delineations in a written procedure."

Because performance of this test requires a minimal amount of work that is extremely simple in nature, we have always considered a procedure not to be required. We still believe this judgment to be correct according to ANSI 18.7 and the Connecticut Yankee Quality Assurance Program and

request the item of non-compliance be withdrawn. However, at the request of the Resident Inspector, we have written a procedure for performing this work, and we will use this in the future whenever we conduct this test. The procedure was approved by the Plant Operations Review Committee and was implemented on September 23, 1982.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

W. G. Council

W. G. Council
Senior Vice President

By:

J. P. Cagnetta

J. P. Cagnetta
Vice President
Nuclear & Environmental
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