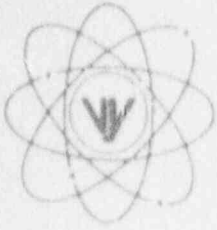


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO
ENGINEERING OFFICE
580 MAIN STREET
BOLTON, MA 01740
(508) 779-6711

March 18, 1994
BVY 94-34

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

- References:
- (a) License No. DPR-28(Docket No. 50-271)
 - (b) Letter, USNRC to VYNPC, Inspection Report No. 50-271/94-04, dated 2/10/94
 - (c) Letter, VYNPC to USNRC, BVY 94-02, dated 1/10/94

Subject: Reply to a Notice of Violation - Inspection Report No. 50-271/94-04

This letter is written in response to Reference (b), which documents that our activities were not conducted in full compliance with NRC requirements. The violation, classified as a Severity Level IV, was identified during a routine inspection conducted from January 3 to January 7, 1994. Our response to this violation is provided below.

VIOLATION:

10CFR Part 50, Appendix B, Criterion XI, Test Control, requires, in part, that a test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Contrary to the above, during an NRC inspection conducted on January 3-7, 1994, the inspectors identified that a test program was not established to demonstrate that the control room ventilation system would perform its intended safety function to maintain a habitable environment for control room personnel and equipment during a postulated accident. A written test procedure was not available that incorporated acceptance limits for the system isolation function. The system isolation function is described in Section 10.12.3.3 of the Final Safety Analysis Report.

This is a Severity Level IV violation.

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RESPONSE:

Reason for the Violation

Vermont Yankee does not contest this violation, which resulted from our failure to recognize that this testing is required to demonstrate that the Control Room Ventilation System would perform satisfactorily in service. Our review of the Control Room HVAC System testing has indicated that although considerable testing of the system had been conducted during installation and upgrades [detailed in Reference (c)], the need for periodic surveillance testing on non-technical specification safety-related equipment was not pursued.

Immediate Corrective Action

The isolation function of the Control Room HVAC System was tested and shown to function satisfactorily on March 11, 1994. This testing was conducted to demonstrate that the equipment would perform its design function. The testing was conducted and documented under our work order process as an interim measure to verify system operability, as described in Section 10.12.3.3 of the Final Safety Analysis Report.

Continuing Corrective Actions

An isolation test utilizing an approved procedure has been added to our surveillance test program. This surveillance, similar to that described above, will be performed on a quarterly basis.

In addition, Vermont Yankee will evaluate current industry practices in this area in order to confirm or enhance the test scope and frequency. This evaluation, including any resultant changes, will be implemented by September 1994.

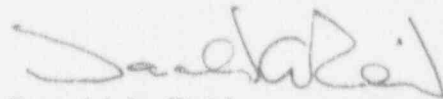
A work scope is currently being developed to address the general issue of surveillance requirements related to safety-related equipment not in the Technical Specifications. Based upon the results of this effort, Vermont Yankee will modify any procedures and/or policies necessary to insure that appropriate surveillances are performed. As requested at our SALP meeting on March 9, 1994 by the Region 1 Administrator, Vermont Yankee will schedule a meeting with the NRC staff to discuss our plans in this area.

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We trust that the information provided is fully responsive to your concerns; however, should you have additional questions or require any additional information, please do not hesitate to contact us.

Sincerely,

VT YANKEE NUCLEAR POWER CORP.



Donald A. Reid
Vice President, Operations

DAR/gmv

cc: USNRC Region 1 Administrator
USNRC Resident Inspector, VYNPS
USNRC Project Manager, VYNPS