

YANKEE ATOMIC ELECTRIC COMPANY

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September 20, 1990

BYR 90-125

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

- References:
- (a) License No. DPR-3 (Docket No. 50-29)
 - (b) Letter, USNRC to YAEC, Generic Letter 90-03, dated March 20, 1990
 - (c) Letter, USNRC to YAEC, Generic Letter 90-03, Supplement No. 1, dated May 14, 1990
 - (d) Letter, FYR 85-75, YAEC to USNRC, dated July 9, 1985
 - (e) Letter, WOG 83-242, Westinghouse to Westinghouse Owners Group Representatives, dated September 15, 1983
 - (f) Letter, BYR 89-117, YAEC to USNRC, dated July 21, 1989

Subject: Response to Generic Letter 90-03, Relaxation of Staff Position in Generic Letter 83-28, Item 2.2, Part 2, "Vendor Interface for Safety-Related Components"

Dear Sir:

Reference (b) requested that Yankee Atomic Electric Company review our present vendor interface programs and modify our programs as necessary to ensure that both of the elements specified in Generic Letter 90-03 are met. The results of our review have determined that the existing programs already include the elements specified in Generic Letter 90-03. Our responses to the generic letter are provided in the attachment to this letter.

We trust this information is satisfactory; however, if you have any questions, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

John DeVincentis
John DeVincentis
Vice President

JD/gjt/WPP72/127

Attachment

cc: USNRC, Region I

USNRC, YNPS Resident Inspector

Add: NRR/DST

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ATTACHMENT

Response to Generic Letter 90-03

First Element

- (a) "A program with the NSSS vendor as described in the VETIP, which covers all the safety-related components within the NSSS scope of supply. This program should include provisions for assuring receipt by the licensee/applicant of all technical information provided by the NSSS vendor.

The programs in (a) above should provide for the licensee or applicant to receive all updates to instruction and maintenance manuals, technical information bulletins, revised test procedures, and updated replacement parts information. The programs should include provisions which ensure the licensee receives all such vendor issued information pertinent to its safety-related equipment."

Response

A Vendor Interface Program (VIP) has been implemented and is being actively maintained with the Westinghouse Electric Corporation, the Nuclear Steam Supply System (NSSS) vendor for the Yankee Nuclear Power Station (YNPS). This program ensures that the YNPS receives all NSSS vendor-issued information pertinent to its safety-related equipment. Technical information includes instruction books, technical bulletins, and data letters for safety-related equipment, parts, and services which are within the NSSS scope of supply. This NSSS VIP conforms with the Vendor Equipment Technical Information Program (VETIP) as described in the Nuclear Utility Task Action Committee (NUTAC) Report, INPO 84-010, issued in March 1984.

As indicated in Reference (d), Westinghouse has forwarded a complete set of technical bulletins and data letters, thus providing the YNPS with a complete, current, and controlled index of NSSS vendor information. As noted in Reference (e), Westinghouse will prepare and transmit to all licensees periodically (but not less frequently than once per year) an updated list of current technical bulletins and data letters. Also, all distributions of safety-related technical bulletins are accompanied by a return receipt, thus assuring receipt by the licensee of all technical information provided by the NSSS vendor.

ATTACHMENT

Response to Generic Letter 90-03
(Continued)

Second Element

- (b) "A program of periodic contact with the vendors of other key safety-related components not included in (a) above.

The program described in (b) above is not intended to be as extensive as the program in (a), but is intended to be a good faith, documented effort to periodically contact the vendors of key, safety-related components (such as auxiliary feedwater pumps, batteries, inverters, battery chargers, cooling water pumps, valve operators, diesel generators, and safety-related electrical switchgear), not already included in the interface program of (a) above, to obtain any technical information applicable to this equipment. Documented periodic contact via telephone is sufficient. It is expected that a reasonable and prudent review of operating experience, availability of vendor information, and component safety significance using insights obtained from generic or plant specific probabilistic risk analyses will yield a set of component vendors that will make up each licensee's program. In the event that vendors have gone out of business, cannot be identified, or will not supply information, the licensee or applicant should implement or continue to maintain a program that will assure that sufficient attention is paid to equipment maintenance, replacement, and repair to compensate for the lack of vendor backup such that equipment reliability commensurate with its safety function is assured."

Response

A program of periodic contact with non-NSSS vendors of other key safety-related components has been established and implemented at the YNPS. During 1989, an extensive action plan was developed and undertaken to improve the non-NSSS VETIP at the YNPS. The NRC was apprised of this program effort in Reference (f). The action plan included the following activities:

- Plant Procedure AP-0075, "Vendor Equipment Technical Information Program," was revised to improve the method of receiving, reviewing, and controlling vendor technical information. This procedure upgrade ensures that Vendor Technical Manuals (VTMs) received on new equipment, and new or updated VTMs received for existing plant equipment, are processed in a controlled and consistent manner. This plant program utilizes the NUTAC VETIP as a reference model and has been tailored to address the plant's specific needs and requirements.

ATTACHMENT

Response to Generic Letter 90-03
(Continued)

- A master inventory of VTMs, located within the plant and at the Yankee Nuclear Services Division (YNSD) engineering offices, was compiled. This effort involved uniquely identifying each VTM and entering relevant information into a computerized data base. A data base cross-referencing plant procedures and VTMs was also created.
- A prioritized listing of plant systems and procedures was developed based upon the safety classification and importance to safety of the systems. Approximately 200 plant procedures, that are used to perform work on safety-related systems, were prioritized and grouped into six different categories.
- A review of safety-related plant procedures relative to mechanical and electrical equipment surveillance and maintenance, and instrumentation and control surveillance, calibration, and maintenance was completed. This review identified all VTMs referenced or used in the performance of the individual procedures.
- Approximately 80 vendors were formally contacted to confirm that VTMs presently in use at the YNPS contain correct information and are applicable to installed plant equipment. Future periodic contact with vendors will be coordinated with the biennial review process of plant procedures. Actual vendors to be contacted will be based upon the previously-established prioritized listing of plant systems and procedures. Where vendors cannot be identified, have gone out of business, or will not supply appropriate information, sufficient attention will be paid to equipment maintenance, replacement, and repair to compensate for the lack of vendor backup such that equipment reliability commensurate with its safety function is assured.
- Utilizing the prioritized listing of plant procedures, approximately 170 procedures were reviewed to confirm that VTM information is adequately incorporated and/or referenced in procedural requirements. Procedure reviews were performed using guidance from INPO Good Practice DE-102, "Control of Vendor Manuals." Any comments identified during the procedure reviews concerning potential safety significance were assigned an appropriate priority for immediate resolution. Comments of a human factors nature or general procedure improvement will be considered during the current biennial review process of plant procedures.