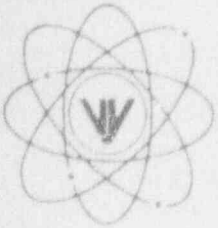


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

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

March 28, 1994
BVY 94-35

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, USNRC to VYNPC, dated 2/25/94

Subject: Response to NRC Request For Additional Information

Reference (b) requested additional information regarding an overflow of a holding tank in the radwaste building. We have conducted a review of the circumstances surrounding this incident and provide the following information in response to your inquiry.

The subject radwaste tank has overflowed in a similar manner in the past. There has been an apparent acceptance of this condition because there was minimal impact on radwaste operations due to a low radiological impact and relative ease of cleanup. The tank in question is utilized for holding depleted bead resin from a demineralizer used for final polishing of water that has previously been filtered and processed through ion exchange medium (Waste Collector Filter). Thus, the activity of the resins contained in the tank is very low and even if a spill of the entire contents of the tank was assumed, the radiological impact would be minimal. However, conditions of this sort do not meet our expectations, and are not acceptable.

Because this was considered to be a routine, non-significant evolution, it did not get appropriate attention in shift briefings and log books, nor was there appropriate attention by operations personnel to preclude or minimize the possibility of an overflow. Further, communications between Operations and Radiation Protection (RP) personnel after the spill occurred was not up to our expectations. We do not however, consider this issue as indicative of a deficiency in the working relationship between Operations and the Radiation Protection Departments. In fact a very good working relationship exists between these two organizations. As an example, our Operations Planning Group hosts a weekly meeting with the major plant departments to prioritize RP manpower planning for the known activities requiring coverage. Beyond this, on a daily basis the Operations Planning Group coordinates closely with RP, as well as other departments, to cover emergent work activities. We consider the communications between these departments to be very professional.

The holding tank level recorder was last calibrated in July 1993. There is also a local, mechanical level indicator, located at the tank that currently has a Work Order written against it because it sometimes sticks. Our review indicates that level indication for this tank was not a significant contributor to the overflow incident, but rather the holding tank's design.

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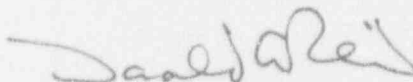
We currently have several radwaste improvement initiatives budgeted for 1994 and will evaluate the design of this tank as a part of that effort. An engineer has been assigned to research the design of this particular holding tank and recommend improvements that can be implemented as part of the 1994 radwaste project. Some items being evaluated to improve the design of this holding tank are a sparger for the fill line, the capacity of the tank and the size of the tank vent line. The radwaste operating procedure utilized for processing these fluids has been revised and was issued on 2/28/94. It now contains several "CAUTION" statements related to monitoring tank level during processes that add water to this tank in order to preclude or minimize the potential for overflow.

Additionally, Vermont Yankee has strived to decrease the contaminated surface areas in the plant to the lowest levels in the plant's history. An overflow of this radwaste tank, while not a significant radiological concern, is certainly contrary to our expectations to maintain the contaminated surface area at low levels. This issue will be provided as an example to our Radiation Protection and Operations personnel to reinforce our expectations that this type of evolution should be a topic of crew shift briefings, that Operations should review practices to prevent or mitigate such spills, that problems encountered during routine operations of systems should be reported to supervision and appropriately logged, and that RP personnel should be informed and requested to sample and evaluate contaminated spills.

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

Sincerely,

Vermont Yankee Nuclear Power Corporation



Donald A. Reid
Vice President, Operations

cc: USNRC Region I Administrator
USNRC Resident Inspector - VYNPS
USNRC Project Manager - VYNPS