

New Hampshire  
**Yankee**

Ted C. Feigenbaum  
President and  
Chief Executive Officer

NYN-91014

February 1, 1991

United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

References: (a) Facility Operating License No. NPF-86, Docket No. 50-443  
(b) USNRC Letter dated December 11, 1990, "NRC Region I Inspection Report No. 50-443/90-84," L. H. Bettenhausen to E. A. Brown

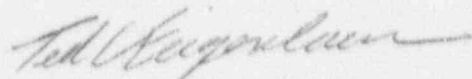
Subject: Response to USNRC Inspection Report No. 50-443/90-84

Gentlemen:

New Hampshire Yankee has reviewed USNRC Inspection Report No. 50-443/90-84. A detailed response to the weaknesses identified in Attachment 3 of the Inspection Report is provided as Enclosure 1. Additionally, NHY will address each of the deficiencies identified in Attachment 2 of the Inspection Report.

Should you have any questions regarding this response, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 474-9521, extension 3772.

Very truly yours,

  
Ted C. Feigenbaum

Enclosure

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United States Nuclear Regulatory Commission  
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cc: Mr. Thomas T. Martin  
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United States Nuclear Regulatory Commission  
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New Hampshire Yankee  
February 1, 1991

ENCLOSURE 1 TO NYN-91014

Reply to Inspection Report No. 50-443/90-84

90-84-01      Review Writer's Guide and strengthen those areas in which direction is vague so as to provide consistency within all EOPs.

Response:

New Hampshire Yankee (NHY) will review and strengthen the EOP Writer's Guide (OP 9.1) to provide expanded guidance to the procedure writer. This will improve the consistency throughout the EOP network. The EOP Writer's Guide is expected to be revised by March 30, 1991. Subsequent to the procedure revision, the EOPs will be reviewed and revised as necessary to conform with the new procedure guidance as well as resolve the deficiencies noted in Attachment 2 of Reference (b). The EOP revisions are scheduled to be completed prior to startup following the first refueling outage.

90-84-02      Correct weaknesses associated with the Operator Action Summary page.

Response:

The Operator Action Summary (OAS) page is provided to the operator to identify operator actions that should be performed when certain symptoms appear during the performance of the procedure. These actions are symptom based actions, not step dependent actions.

Each procedure that has an associated OAS contains a NOTE before its first step, directing the operator to "Review the OPERATOR ACTION SUMMARY periodically."

The OAS page has recently been added as the last page of each procedure, following any figures or attachments. The OAS is always a numbered page. For example, in procedure E-O, "Reactor Trip of Safety Injection," the OAS page is page 27 of 27. This will eliminate the operator's confusion as to whether or not an OAS page belongs in the procedure.

As part of the EOP maintenance program, the OAS page for each procedure will be reviewed based on the criteria in the first paragraph above. Any item that does not meet the criteria will be revised or removed. This review will be completed in time to allow these changes to be incorporated into the next scheduled EOP revision. In addition, an Operations Department "Good Practice" has been approved and issued, effective January 6, 1991, addressing the subject of communications during plant operations.