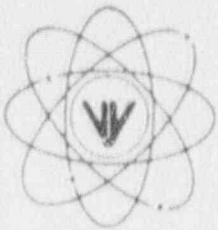


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

BVY 91-13

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

January 28, 1991

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

References: a) License No. DPR-28 (Docket No. 50-271)
b) Letter, USNRC to VYNPC, NVY 90-212, dated 11/27/90
c) Letter, VYNPC to USNRC, BVY 90-126, dated 12/27/90

Dear Sir:

**Subject: Revision to our Response to Inspection Report 50-271/90-10,
Notice of Violation, Notice of Deviation and Identified Weaknesses**

After our discussions with Jon R. Johnson, Chief, Reactor Projects Branch No. 3, and Harold Eichenholz, Senior NRC Resident Inspector, we more fully understand the bases for the NRC's position on the violations transmitted in Reference b). Based on this additional information, we are submitting this revision to our response submitted as Reference c).

The alleged violations, classified as Severity Level IV, were identified as a result of inspections conducted by the NRC Resident Inspector during the period August 13-October 9, 1990.

VIOLATION

Technical Specification Section 6.5, Plant Operating Procedures, requires that detailed written procedures involving both nuclear and non-nuclear safety, covering operation of systems and components of the facility including applicable check-off lists and instructions shall be prepared, approved, and adhered to. Operating Procedure OP 2184, Fuel Pool Cooling System, requires that from and after the date that one of the fuel pool cooling subsystems is made or found inoperable (and the remaining subsystem is capable of maintaining the fuel pool temperature below 150 degrees F) then the reactor shall be in cold shutdown within thirty days unless such subsystem is sooner made operable.

Contrary to the above, between August 4, 1989 and July 3, 1990 the reactor was not placed in a cold shutdown condition, when the "A" fuel pool cooling subsystem remained inoperable for more than thirty days with the "A" fuel pool cooling pump power supply breaker, P9-1A white tagged (Danger Tagged) in the open position.

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RESPONSE

An investigation of an intermittent ground was completed on June 13, 1989 and the breaker for the "A" fuel pool cooling pump was opened and white tagged. The intention of placing the white tag was to provide additional assurance beyond a caution tag that the "B" pump would be preferentially operated. It was understood by appropriate operations and maintenance personnel that the intermittent electrical ground on the "A" pump did not preclude its use.

Although there are instructions in procedure AP 0140, Vermont Yankee Local Control Switching Rules, on how the white tag could have been cleared if the "A" pump was needed, we agree that the use of a white tag in this situation is potentially confusing and therefore, not a desirable practice for providing limitations on operable components. Although Vermont Yankee has on occasion used white tags on components that have been considered operable, we now agree that this practice should be discontinued. We will revise AP 0140 by March 1, 1991 to ensure white tags will not be used on operable equipment.

VIOLATION

10 CFR 50, Appendix B, Criterion XVI, requires that conditions adverse to quality, such as defective equipment and nonconformances be promptly identified and corrected. Additionally, 10 CFR 50.49(f) requires that electrical equipment important to safety be qualified, in part, by testing or by analysis in combination with partial type test data. As stated in the licensee's Environmental Qualification Program Manual, the "A" Spent Fuel Pool cooling pump motor is environmentally qualified (electrical) equipment important to safety.

Contrary to the above, the "A" Spent Fuel Pool cooling pump motor was not qualified, due to lack of testing or analysis in the degraded condition. Between June 9, 1989 and July 27, 1990, the pump motor was in a degraded condition in that at least one phase of the motor winding shorted to ground following a brief period of operation. The condition adverse to quality represents a nonconformance that was not promptly identified and corrected.

RESPONSE

As discussed in Attachment A to the Inspection Report, Vermont Yankee promptly identified the potentially degraded condition of the "A" Spent Fuel Pool cooling pump motor and performed the appropriate troubleshooting and testing, including resistance to ground measurements. Further testing of this motor would have required destructive testing which was considered inappropriate. Based on the results of the testing performed, it was concluded at the time that the motor was capable of performing its intended function in the as-found condition. The motor was not considered as being in an indeterminate condition as identified by the EQ Program and therefore no further engineering evaluation was performed.

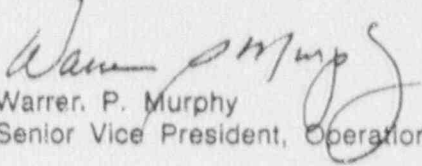
Vermont Yankee agrees that the evaluation should have included further engineering analysis to assure the qualification of the equipment was maintained in accordance with 10CFR50.49. To assure that we provide comprehensive evaluations of potential degradations

of equipment qualification, we will revise the corrective maintenance process by March 1, 1991 to require a written engineering evaluation, whenever necessary, to assure that potentially degraded equipment is fully qualified in accordance with the Vermont Yankee EQ Program.

We trust the information provided above adequately addresses your concerns; however, should you have any questions or desire additional information, please do not hesitate to contact us.

Very truly yours,

Vermont Yankee Nuclear Power Corporation


Warren P. Murphy
Senior Vice President, Operations

/dm

cc: USNRC Regional Administrator, Region I
USNRC Resident Inspector, VYNPS
USNRC Project Manager, VYNPS