

# VERMONT YANKEE NUCLEAR POWER CORPORATION



RD 5, Box 169, Ferry Road, Brattleboro, VT 05301

2.C.2.11  
FVY 82-114

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD  
FRAMINGHAM, MASSACHUSETTS 01701  
TELEPHONE 617-872-8100

November 2, 1982

U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Attention: Mr. Richard W. Starostecki, Director  
Division of Project and Resident Programs

References: (a) License No. DPR-28 (Docket No. 50-271)  
(b) USNRC Letter to VYNPC, dated September 27, 1982  
and Inspection Report 50-271/82-14

Dear Sir:

Subject: Response to I&E Inspection No. 82-14 (Viol. 82-14-02)

This letter is written in response to Reference (b) which indicates that one of our activities was not conducted in full compliance with Nuclear Regulatory requirements. This alleged Level V violation was noted as a result of a routine inspection conducted by your Mr. W. Raymond during the period July 6-30, 1982.

Information is submitted as follows in answer to the alleged violation contained in the appendix to your letter.

Item:

Technical Specification 6.5.B requires that radiation protection procedures be prepared and maintained to implement the requirements of 10 CFR 20. Procedure A.P. 0503, Establishing and Posting Controlled Areas, was prepared pursuant to the requirements of Technical Specification 6.5.B. A.P. 0503 defines "hot spots" within radiation areas and specifies posting requirements for these "hot spots" which include a sticker, annotated with the radiation dose rate.

Contrary to the above, during a routine radiation survey on July 14, 1982, the inspector identified a defined "hot spot" radiation area on the section of the Main Steam Drain Line located above the Torus Catwalk (Reactor Building 250 foot elevation - West) that read 250 mRem/hr on contact, 100 mRem/hr at 12 inches, but was not posted and annotated per A.P. 0503.

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Response:

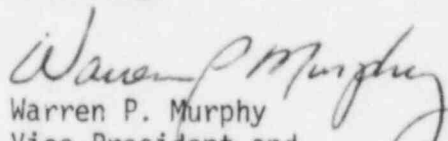
Vermont Yankee takes exception to the alleged violation as stated in the Appendix to the subject Inspection Report. Our existing program requires a survey of the area in question on a monthly basis and posting of any radiation "hot spots" upon discovery. This program complies with the requirements of 10 CFR 20.201 for surveys which (1) may be necessary for the licensee to comply with the regulations in this part, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

The Torus Catwalk area had been routinely surveyed satisfactorily on June 15, 1982. The "hot spot" on the Main Steam Drain Line, discovered by the Resident Inspector on July 19, 1982, resulted from a stuck steam trap. This is not an ordinary occurrence for which we feel it is warranted to change our existing procedures and require more frequent monitoring or barricades. Our periodic surveys are designed to detect occurrences of this type. We are fully confident that the "hot spot" would have been detected during the next scheduled survey during the week of July 19, 1982, and would have been properly posted. The Torus Catwalk area is not regularly entered by personnel other than Health Physics technicians and auxiliary operators performing routine surveillances. Access for other work is preceded by special surveys.

After the Resident Inspector informed Vermont Yankee of the "hot spots", Health Physics personnel immediately surveyed the line and the surrounding area and completed the appropriate postings. The line above the catwalk was covered with a lead blanket shielding which reduced the dose rate on the catwalk to half its original level. This shielding will remain in place until the dose rate in the line is reduced to typical levels.

We trust this information is satisfactory. If you need additional information, please feel free to contact us.

Sincerely,

  
Warren P. Murphy  
Vice President and  
Manager of Operations

WPM/jh