

# New Hampshire Yankee

Ted C. Feigenbaum  
President and  
Chief Executive Officer

NYN-91112

July 15, 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 June 14, 1991, "NRC Region I Inspection 50-443/91-09 (04/23/91 - 05/27/91)," J.C. Linville to T.C. Feigenbaum

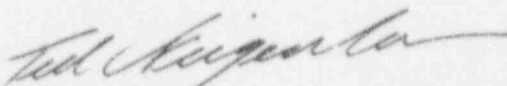
Subject: Reply to a Notice of Violation

Gentlemen:

In accordance with the requirements of the Notice of Violation contained in Reference (b), the New Hampshire Yankee response to the cited violation is provided as Enclosure 1.

Should you have any questions concerning our 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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New Hampshire Yankee Division of Public Service Company of New Hampshire  
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United States Nuclear Regulatory Commission  
Attention: Document Control Desk

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cc: Mr. Thomas T. Martin  
Regional Administrator  
United States Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Mr. Gordon Edison, F. Project Mgr.  
Project Directorate I-3  
Division of Reactor Projects  
U.S. Nuclear Regulatory Commission  
Washington DC 20555

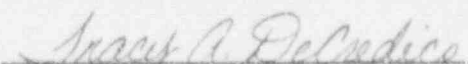
Mr. Noel Dudley  
NRC Resident Inspector  
P.O. Box 1149  
Seabrook, NH 03874

STATE OF NEW HAMPSHIRE

Rockingham, ss.

July 15, 1991

Then personally appeared before me, the above-named Ted C. Feigenbaum, being duly sworn, did state that he is President & Chief Executive Officer of the New Hampshire Yankee Division of Public Service Company of New Hampshire, and that he is duly authorized to execute and file the foregoing information in the name and on the behalf of New Hampshire Yankee Division of the Public Service Company and that the statements therein are true to the best of his knowledge and belief.

  
Tracy A. DeCredico, Notary Public  
My Commission Expires: October 3, 1995



New Hampshire Yankee  
July 15, 1991

ENCLOSURE TO NYN-91112



## REPLY TO A NOTICE OF VIOLATION

### Violation:

During NRC inspection from April 23 - May 27, 1991, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, that violation is cited below:

Technical Specification 3.6.3 requires that inoperable containment isolation valves be isolated from each affected penetration by use of at least one deactivated automatic valve which is secured in the isolation position.

Contrary to the above between April 5-16, 1991, Containment Isolation Valve SI-V61 was inoperable but not isolated from each affected penetration by use of at least one deactivated automatic valve secured in the isolation position.

This is a Severity Level IV violation (Supplement I).

### Response:

New Hampshire Yankee (NHY) has determined that the cause of this violation was an inadequate procedure. Procedure OS1005.05, SI System Operation, was inadequate in that it did not identify valve SI-V61 as a normally locked closed valve. A contributing factor to this violation was the failure of the auxiliary operator to notify the control room that the valve being manipulated, SI-V61, was a locked valve. Consequently, on April 5, 1991 the control room operator did not recognize that a locked valve was out of position and therefore failed to verify SI-V61 closed as required by Procedure OS1005.05. He also did not realize that the Limiting Condition for Operation requirements for Technical Specification 3.6.3, Containment Isolation Valves, were not satisfied.

Upon discovery that SI-V61 was open on April 16, 1991, it was immediately locked closed. New Hampshire Yankee's short term corrective action also included the revision of Procedure OS1005.05 to explicitly identify the requirements to "UNLOCK and OPEN SI-V61" and to "LOCK CLOSED SI-V61." The explicit identification of these procedural requirements will ensure that NHY's normal practice of notifying the control room operators of the manipulation of a locked valve will take place and that such manipulations will be logged. New Hampshire Yankee has also conducted training for its control room personnel regarding proper communication with respect to repositioning locked valves.

New Hampshire Yankee's long term corrective actions will include a review of other operating procedures for similar procedural inadequacies. This review and any required procedure revisions will occur during the normal procedure review cycle and will be completed by July 1993. New Hampshire Yankee will also develop technical guidance addressing the appropriate actions to be taken when manipulating valves (e.g. test, vent and drain valves) within the containment penetration pressure boundary. This action is expected to be completed by July 31, 1991. Additionally, NHY will evaluate the design and location of the pressure instruments downstream of SI-V61 to determine if the locked valve requirement can be eliminated by relocating the instruments or by upgrading their safety classification. This evaluation is being completed during the development of a design change which is expected to be implemented during the second refueling outage.

The actions taken by NHY have resulted in compliance with Technical Specification 3.6.3 on April 16, 1991. Additionally the long term corrective actions described above will ensure continued compliance with this Technical Specification.