

New Hampshire Yankee

Ted C. Feigenbaum
President and
Chief Executive Officer

NYN-91188

November 27, 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 November 1, 1991, "NRC Region 1 Inspection 50-443/91-29 (9/10/91 - 10/14/91)" J. C. Linville to T. C. Feigenbaum

Subject: Response 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 this response, please contact Mr. James M. Peschel, Regulatory Compliance Manager at (603) 474-9521, extension 3772.

Very truly yours,




Ted C. Feigenbaum

STATE OF NEW HAMPSHIRE

Rockingham, ss.

November 27, 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, 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

Enclosure
TCF:TGP/act

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cc: Mr. Thomas T. Martin
Regional Administrator
U. S. Nuclear Regulatory Commission
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475 Allendale Road
King of Prussia, PA 19406

Mr. Gordon E. Edison, Sr. Project Manager
Project Directorate 1-3
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Noel Dudley
NRC Senior Resident Inspector
P.O. Box 1149
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New Hampshire Yankee
November 27, 1991

ENCLOSURE TO NYN-91188

REPLY TO A NOTICE OF VIOLATION

Violation

During NRC inspection from September 10 - October 14, 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 listed below:

Technical Specification 6.7.1.a requires that the procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, be established, implemented, and maintained. Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, Section 1.c specifies in part that procedures be established for equipment control (e.g., locking and tagging). New Hampshire Yankee procedure MA4.2, Equipment Tagging and Isolation, Section 4.9 requires that tagging order boundary components be restored to their proper positions. Procedure ON1055.01, Revision 4 (Change 20), Fill and Vent of Demineralized Water System, specified the normal position of DM-V301 as closed.

Contrary to the above, on about September 30, 1991, demineralized water system valve DM-V301 was aligned in the open position during system restoration following completion of maintenance on the letdown line radiation monitor resulting in contamination of the demineralized water system.

This is a Severity Level IV violation (Supplement 1).

Reason for the Violation

New Hampshire Yankee (NHY) has determined that the root cause of the Demineralized Water System contamination was personnel error. The personnel completing a tagging restoration sheet utilized valve position data from a computerized tagging database which was in the development phase, instead of using a system valve lineup procedure.

On September 18, 1991, Demineralized Water System manual isolation valve, DM-V301, was opened in accordance with an incorrect tagging restoration sheet. The tagging restoration was performed following maintenance on the Chemical and Volume Control System (CVCS) letdown line radiation monitor. The tagging restoration sheet was completed solely by reference to valve position information contained in a computerized tagging database. At this time the database was under development, and not intended to be used to determine system restoration valve position. The appropriate valve lineup procedure should have been used to determine correct valve position.

The mispositioning of DM-V301 did not become evident until September 30, 1991. On that date, an inadvertent flow path from the Reactor Coolant System (RCS) to the Demineralized Water (DM) System was established. This occurred while the steam generators were being filled. The demand for DM reduced the pressure in the DM System below the pressure in the CVCS letdown line to the radiation monitor. The reduction in the DM System pressure allowed a solenoid operated valve, RV-6520-02, to come off its seat enabling RCS flow into the DM System through the mispositioned valve DM-V301.

Corrective Action

Upon discovery of the DM System contamination, a radiation survey of the DM System was performed to determine the exact point of contamination. The contamination path was identified to be through DM-V 01 and the valve was immediately closed.

New Hampshire Yankee's immediate corrective actions included the following:

- 1) The DM System Lineup Procedure (ON1055.01) was reviewed to ensure that the DM valves which are required to be closed are included on the Maintained Closed Valve List.
- 2) A complete valve lineup of the DM System was performed to verify that no additional valves were mispositioned. All valves were determined to be properly positioned.
- 3) A review of the tagging restorations produced by the tagging computer database was performed to verify proper valve lineups. All valves were determined to be properly positioned.
- 4) Use of the tagging computer database in the preparation of tagging restorations was discontinued and the Shift Superintendents personnel were counseled on completing tagging restoration sheets using the appropriate system restoration valve lineup.
- 5) Spectacle flanges were installed on three radiation monitoring skids to provide additional assurances that process fluid will not enter the DM System.
- 6) A Safety Evaluation was performed to verify that plant operation would not involve an unreviewed safety question.

Corrective Action to Prevent Recurrence

New Hampshire Yankee's long term corrective actions will include a review of system interfaces between non-contaminated systems and potentially contaminated systems. This review will identify potential system enhancements and will include industry experience in this area. It is anticipated that this review will be completed by December 30, 1991. New Hampshire Yankee will also develop radiation monitoring skid purge procedures for the manipulation of radiation monitor valves. These procedures will include a precaution concerning DM System pressure being lower than the process fluid pressure. It is anticipated that these procedures will be completed by March 1, 1992. New Hampshire Yankee will also validate the computerized tagging database prior to its use in tagging restoration. The database will also be provided with sufficient security to ensure only valid changes/revisions can be made to it. It is anticipated that the enhancements to the computerized tagging database will be completed by May 1, 1992.

Date of Full Compliance

The immediate corrective actions taken by New Hampshire Yankee resulted in compliance with Technical Specification 6.7.1a. Additionally, the long term corrective actions described above will ensure continued compliance with this Technical Specification.