

New Hampshire Yankee

Ted C. Feigenbaum
President and
Chief Executive Officer

NYN- 92002

January 6, 1992

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 5, 1991, "NRC Region I Inspection
50-443/91-32 (10-15-91/11-18-91) J. C. Linville to T. C. Feigenbaum

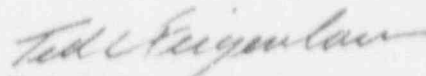
Subject: Reply to Notice of Violation

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

Enclosure
TCF:TGP/ss

STATE OF NEW HAMPSHIRE

Rockingham, ss.

January 6, 1992

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

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PDR

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United States Nuclear Regulatory Commission
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cc: Mr. Thomas T. Martin
Regional Administrator
U. S. Nuclear Regulatory Commission
Region 1
475 Alandale Road
King of Prussia, PA 19406

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

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

New Hampshire Yankee
January 6, 1992

ENCLOSURE TO NYN-92002

Violation

During the NRC Inspection of October 15, 1991 to November 18, 1991, a violation of NRC requirements was identified in accordance with the General Statement of Policy and Procedure for NRC Enforcement Actions 10CFR, Part 2, Appendix C. That violation is listed below:

Technical Specification 6.2.2.(e) requires administrative procedures be developed and implemented to limit the working hours of station staff who perform safety-related functions, such as licensed operators. New Hampshire Yankee Station Management Manual, Chapter 2, Section 6.2, "Extended Work Hour Requirements For Safety-Related Functions," requires Station Manager's authorization documented on SSMM Form 4-4A, "Extended Work Hours Authorization," for any individual to work more than 72 hours within a seven day period.

Contrary to the above, during the week ending August 14, 1991, two licensed operators did not receive Station Manager's documented authorization prior to working more than 72 hours within a seven day period.

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

Reason for Violation

New Hampshire Yankee (NHY) has determined that the reason for this violation was an administrative error. The Operations Manager approves the Operations Shift Schedule and performs a review of the Extended Work Hours Authorization forms to support the Shift Schedule. Extended Work Hours Authorization forms (SSMM Form 4-4A) are then submitted to the Station Manager for his approval. Contrary to these requirements, the Operations Manager failed to identify the need for the Extended Work Hours Authorization forms for two licensed operators who were assigned Work Control Activities, (eg. processing work requests and preventative maintenance activities).

Corrective Action to Prevent Recurrence

The Operations Manager and the two licensed operators were counselled on the requirement to obtain Station Manager approval for work hours in excess of the Station guidelines.

A "walk-thru" of the Station Management Manual administrative process used to approve extended work hours was performed to ensure that all administrative barriers that could have prevented this occurrence were verified and understood. It was determined that the administrative process used to prepare, review, approve and issue Extended Work Hours Authorization requires no changes. This was an isolated incident, and on an overall basis, the effectiveness of the administrative process was proven during the refueling outage. The Station Manager continually stressed, throughout the outage, the need and requirement to effectively complete all administrative activities in a correct and timely manner, and specifically the Extended Work Hours Authorization requests.

NHY is presently developing plans and schedules for the Second Refueling Outage including manpower and shift schedule requirements. In conjunction with these planning activities, the Station Manager is evaluating the need to make adjustments, to the refueling shift schedules. It is anticipated that this review and any revisions to the refueling outage shift schedules will be completed by September 1, 1992.

Date of Full Compliance

New Hampshire Yankee is currently in compliance with Technical Specification 6.2.2.(c). Additionally, the long term corrective actions described above are expected to ensure continued compliance with this Technical Specification.