

DED

September 12, 1995

Mr. Donald A. Reid  
Vice President, Operations  
Vermont Yankee Nuclear Power Corporation  
RD 5, Box 169  
Ferry Road  
Brattleboro, Vermont 05301

SUBJECT: INSPECTION REPORT NO. 50-271/95-11

Dear Mr. Reid:

This letter refers to your August 11, 1995 correspondence, in response to our July 14, 1995 letter.

Thank you for informing us of the corrective actions documented in your letter. We agree that the structural integrity of primary containment was adequately demonstrated following the satisfactory performance of the Type A integrated leak test, and of the inspections of the drywell/torus and the drywell head when identified by the inspector. Appropriate revisions to the containment integrated leak rate test procedure to ensure the pre-requisite drywell head inspections are properly conducted appear to be a satisfactory resolution to this issue. These procedure revisions and the effectiveness of any additional actions taken pending completion of your root cause analysis for why the drywell head interior inspections were not previously performed, will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

James C. Linville, Chief  
Reactor Projects Branch 3  
Division of Reactor Projects

Docket No. 50-271

cc:

R. Wanczyk, Plant Manager  
J. Thayer, Vice President, Yankee Atomic Electric Company  
J. Duffy, Licensing Engineer, Vermont Yankee Nuclear Power Corporation

Mr. Donald A. Reid

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cc w/cy of Licensee's Response Letter

J. Gilroy, Director, Vermont Public Interest Research Group, Inc.

D. Tefft, Administrator, Bureau of Radiological Health, State of New Hampshire

Chief, Safety Unit, Office of the Attorney General, Commonwealth of  
Massachusetts

R. Gad, Esquire

G. Bisbee, Esquire

R. Sedano, Vermont Department of Public Service

T. Rapone, Massachusetts Executive Office of Public Safety

D. Screnci, PAO

NRC Resident Inspector

State of New Hampshire, SLO Designee

State of Vermont, SLO Designee

Commonwealth of Massachusetts, SLO Designee

Mr. Donald A. Reid

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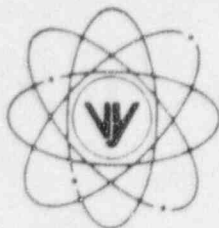
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# VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

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

August 11, 1995  
BVY 95-86

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

References:       a)     License No. DPR-28 (Docket No. 50-271)  
                      b)     Letter, USNRC to VYNPC, "Notice of Violation (Vermont  
                                  Yankee Inspection 95-11)", dated July 14, 1995

Subject:     Reply to a Notice of Violation - Inspection Report No. 50-271/95-11

This letter is written in response to Reference b), which documents that our activities were not conducted in full compliance with NRC requirements. The violation, classified as Severity Level IV, was the result of an NRC inspection conducted on April 23 through June 3, 1995. Our reply to the Notice of Violation is provided below.

## VIOLATION:

10 CFR Part 50, Appendix J, Paragraph V.A. requires, in part, that general inspections of containment interior surfaces shall be performed to uncover any evidence of structural deterioration. 10 CFR Part 50, Appendix B, Criterion 10, "Inspection," requires that an inspection program be established to assure that structures, systems, and components will perform satisfactory in service.

Contrary to the above, as of June 3, 1995, facility procedures (Operating Procedures Nos. 4029 and 5250) do not include detailed instructions for the general inspection of the interior surface of the drywell head which is part of the containment structure. This resulted in Vermont Yankee's failure to inspect the drywell head inner surface prior to the performance of the Type "A" containment integrated leak rate test during the 1995 refueling/maintenance outage.

This is a Severity Level IV violation.

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RESPONSE:

Reason for the Violation:

Vermont Yankee does not contest this violation. We have attributed the violation to be the result of an inadequate procedure in that we previously did not consider the interior of the drywell head to be accessible and consequently did not require this inspection in our procedures. We have since compared the requirements stated in Appendix J, Paragraph V.A. and Appendix B, Criterion 10 to OP 4029 "Type 'A' - Primary Containment Integrated Leak Rate Testing," and agree that prior to the Type "A" test, the general inspection of the accessible interior surfaces of the containment structures (drywell & torus) should include the interior of the drywell head.

It was our intention that the inspection performed under Operating Procedure 4029 would meet the requirements of 10 CFR Part 50, Appendix J, Paragraph V.A. OP 4029 also requires that the Primary Containment inspections performed under OP 5250 "Maintenance/Inspection of Primary Containment Interior Surfaces" be reviewed to ensure there were no repairs made that could affect the Type "A" test and/or require reporting under Appendix J, Paragraph V.A. OP 5250 was never intended to be the document used to satisfy the requirements of 10 CFR Part 50, Appendix J, Paragraph V.A. A general inspection of the accessible containment surfaces (including the exterior of the drywell head) was performed prior to the 1995 Type "A" test in accordance with OP 4029. An informal inspection of the drywell head interior is performed each outage by the Maintenance Department during drywell head disassembly and reassembly.

Immediate Corrective Actions:

Based on the Engineering inspection (of the drywell head exterior) per our procedure, OP 4029, the informal Maintenance inspection, the inspection performed by the Operations Department after the Type "A" test, and the successful completion of the Type "A" integrated leak test, Vermont Yankee has determined there is no evidence of structural deterioration and that there is reasonable assurance that this structure will perform satisfactorily in service.

Continuing Corrective Actions:

Our procedure(s) will be revised to ensure that a general inspection of the drywell head interior is performed prior to the performance of Type "A" integrated leak rate test in accordance with Appendix J, Paragraph V.A. in the future. We expect these procedures will be revised by January 1, 1996.

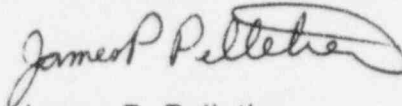
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An Event Report (Vermont Yankee's Corrective Action Program) has been initiated to further evaluate this event. A Root Cause Analysis will be performed to determine why the previous containment inspections did not include the interior of the drywell head. This Event Report will be completed by October 1, 1995.

We trust that the enclosed information is satisfactory; however, should you have any questions or desire additional information on this issue, please do not hesitate to contact us.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

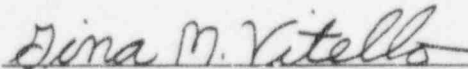


James P. Pelletier  
Vice President, Engineering

cc: USNRC Regional Administrator, Region 1  
USNRC Resident Inspector, VYNPS  
USNRC Project Manager, VYNPS

STATE OF VERMONT     )  
                                  )ss  
WINDHAM COUNTY     )

Then personally appeared before me, James P. Pelletier, who, being duly sworn, did state that he is Vice President, Engineering, of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing document in the name and on the behalf of Vermont Yankee Nuclear Power Corporation, and that the statements therein are true to the best of his knowledge and belief.



Gina M. Vitello, Notary Public  
My Commission expires February 10, 1999

