

APPENDIX A

NOTICE OF VIOLATION

Vermont Yankee Nuclear Power Corporation
Vermont Yankee Nuclear Power Station
Vernon, Vermont

Docket No. 50-271
License No. DPR-28

As a result of the inspection conducted on April 3 to May 7, 1984, and in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register on March 8, 1984 (49 FR8583), the violations discussed below were identified. The following discussion is pertinent to Items A and B below.

Reactor water level exceeded the high level trip setpoint during the recovery from a reactor scram on April 16, 1984, which caused a trip signal to be sealed in on the high pressure coolant injection (HPCI) system trip-throttle valve. The HPCI isolation logic remained in the tripped condition after reactor level decreased below the trip setting, even though the 'HPCI High Level Shutdown' annunciator on the main control board had cleared. The logic remains in the tripped condition until the logic reset pushbuttons are depressed. However, the reset pushbuttons were not depressed during the scram recovery operations.

Plant operators noted that the HPCI trip-throttle valve did not open upon demand during the performance of a valve operability test on April 20, 1984. The valve subsequently opened after the HPCI high water level reset pushbutton was depressed. The operators concluded that there had been no problem with HPCI operability since a reactor vessel low water level trip signal would override the high water level isolation on the trip-throttle valve and provide for HPCI operation in response to an accident condition.

On April 25, 1984, after subsequent operator review and discussion of the actions taken during the April 20, 1984 valve test, it was realized that a problem could have existed with HPCI operability. The HPCI operability question was evaluated by licensee management and it was determined that the High Drywell Pressure initiation circuitry of HPCI was invalidated (locked out) from the time of the high level trip on April 16, 1984 until the logic reset pushbutton was depressed on April 20, 1984. The licensee reported to the NRC Duty Officer on April 25, 1984 that the HPCI high drywell pressure initiation circuit had been inoperable from April 16-20, 1984.

- A. Technical Specification 3.5.E requires that the HPCI system be operable during reactor operations above 150 psig. Technical Specification 3.2 requires for the HPCI system to be considered operable that the system be capable of automatically initiating in response to conditions of low reactor vessel water level and high drywell pressure.

Contrary to the above, the HPCI system was inoperable from about 8:30 A.M. on April 16, 1984 until about 4:45 A.M. on April 20, 1984, in that the system was incapable of automatically starting upon receipt of a high drywell pressure initiation signal.

This is a Severity Level IV Violation (Supplement I.D).

- B. Technical Specification 6.5.A requires that written procedures governing reactor startup operations be implemented and followed. Technical Specification 6.5.D allows temporary changes to be made to approved operating procedures provided certain controls are followed regarding review and documentation of the changes.

Procedure OP 0100, Reactor Startup to Criticality, Revision 14, was written pursuant to Technical Specification 6.5.A to specify the steps required to achieve reactor criticality. Step 4 of OP 0100 requires that the Reactor High Water Level Isolation logic for the HPCI system be reset prior to taking the reactor critical.

Contrary to the above, the reactor was taken critical at 8:30 P.M. on April 16, 1984 without resetting the Reactor High Water Level Isolation logic as required by Step 4 of OP 0100 and no temporary change to OP 0100 was processed in accordance with established administrative controls. Failure to reset the isolation logic resulted in the violation discussed in Item A above.

This is a Severity Level IV Violation (Supplement I.D).

- C. Technical Specification 6.5 requires that written procedures governing reactor operations be implemented and followed. Procedure OP 2145, Revision 7, was written pursuant to Technical Specification 6.5 to provide instructions to operate the 125 VDC Distribution system during normal plant operations. Appendix A of OP 2145 requires that the circuit breaker for vessel head spray valve RHR-33 on distribution panel DC-2A be OPEN, and that circuit breaker #12 on distribution panel DC-2D for the startup transformer fire protection circuit be OPEN.

Contrary to the above, the following discrepancies were identified between the breaker alignment required by OP 2145 and the actual breaker positions in the plant: the circuit breaker for RHR-33 on DC-2A was found in the CLOSED position at 1:00 P.M. on May 4, 1984; and, the circuit breaker for the startup transformer fire protection system on DC-2D was found in the CLOSED position at 4:30 P.M. on May 7, 1984.

This is a Severity Level V Violation (Supplement I.E).

Pursuant to the provisions of 10 CFR 2.201, Vermont Yankee Nuclear Power Corporation of Vernon, Vermont, is hereby required to submit to this office within thirty days of the date of the letter transmitting this Notice, a written statement of explanation in reply, including for each violation: (1) corrective steps which have been taken and the results achieved; (2) corrective steps that will be taken to avoid further violations; and (3) the date when corrective actions will be completed. Where good cause is shown, consideration will be given to extend your response time.