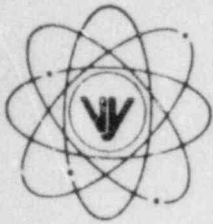


# VERMONT YANKEE NUCLEAR POWER CORPORATION



RD 5, Box 169, Ferry Road, Braintreeboro, VT 05301

FVY 84-41

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD

FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-8100

May 11, 1984

U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Attention: Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs

References: a) License No. DPR-28 (Docket No. 50/271)  
b) Letter, USNRC to VYNPC, dated April 11, 1984, and  
Inspection Report No. 84-06, Appendix A (Notice of Violation)

Dear Sir:

Subject: Response to Inspection Report 84-06

This letter is written in response to Reference b), which indicates that one of our activities was not conducted in full compliance with Nuclear Regulatory Commission requirements. This alleged Level IV violation was identified as a result of an inspection conducted by your Mr. H. Bicehouse during the period of March 12-16, 1984.

Information is submitted as follows in answer to the alleged violation and deviation contained in the Appendix to your letter.

ITEM: Technical Specification 6.0, "Administrative Controls," requires, in part, adherence to instructions and procedures. Technical Specification 6.5.B, "Operating Procedures," requires, in part, establishment of procedures for radiological protection consistent with 10 CFR Part 20. Procedure Number AP 0502, "Radiation Work Permits," (Revision 12, 9/27/83), requires, in part, specification on radiation work permits of radiological hazard control procedures to be observed during work assignments in Radiation Control Areas. Radiation Work Permit Numbers 83-1465 and 84-93 required, in part, breathing zone air samples (a radiological control hazard procedure) to be taken for operations under these permits.

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Contrary to the above, breathing zone air samples, required by Radiation Work Permit Numbers 83-1465 and 84-93, were not taken during 22 occasions under these permits from December 9, 1983 through February 3, 1984.

RESPONSE

Radiation Work Permit 83-1465 was written to control one activity that took place in two distinct and separate atmospheres. Permits of this nature remained in effect for one (1) month. Subsequent to its expiration, RWP 84-93 was issued to continue the activity.

Sandblasting, controlled under these permits, was performed inside an enclosed tent which was ventilated through a HEPA unit. Transfer of materials to be sandblasted took place inside the reactor building airlock but outside the tent, and was controlled under the same work permits.

The atmosphere in the airlock was essentially that of the reactor building. It was substantially lower than MPC 40 during the entire period that the RWP's were in effect. The atmosphere inside the blasting tent varied as blasting occurred, reaching a maximum of 7.6 times MPC 40, as mentioned on page 5 of the Inspection Report.

The referenced RWP's included a provision for "special instructions" (to be given by the assigned HP technician) in order to achieve the required levels of protection and monitoring warranted by the separate atmospheres involved. Under these instructions, breathing zone air samples were to be taken inside the tent when sandblasting was in process. Additional air sampling was accomplished in the form of routine general area samples of the airlock and 252' elevation of the reactor building.

Interviews with Vermont Yankee health physics supervisors and the health physics liaison for the contractor involved confirmed that breathing zone air samples were indeed obtained whenever airborne radioactivity concentrations exceeded or were likely to exceed ambient RX building air concentrations.

The times cited in the Notice of Violation when no breathing air samples were taken occurred either during a transfer of materials within the airlock or while general support work relating to sandblasting was being performed. None of the instances involved direct sandblasting or any other work that would have led to airborne radioactive concentrations in excess of normal ambient reactor building levels.

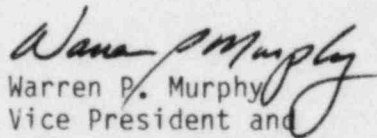
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Since the RWP's did provide for special instructions to be given by ANSI qualified HP technicians, and these instructions were given in a manner that afforded the levels of protection necessary to limit personnel exposures to airborne radioactivity to concentrations well below those listed in Appendix B of 10 CFR 20 and in the absence of any evidence to the contrary, we do not believe that a violation of Technical Specifications 6.0 and 6.5 occurred. Vermont Yankee, therefore, respectfully requests that the violation be withdrawn.

We trust that this information will be satisfactory; however, should you have any questions or desire additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

  
Warren P. Murphy  
Vice President and  
Manager of Operations