

VERMONT YANKEE NUCLEAR POWER CORPORATION



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FVY 84-44

REPLY TO

ENGINEERING OFFICE

1671 WORCESTER ROAD

FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-8100

May 8, 1984

U.S. Nuclear Regulatory Commission
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 2, 1984 and
Inspection Report No. 84-02, Appendix A (Notice of
Violation) and Appendix B (Notice of Deviation)

Dear Sir:

Subject: Response to Inspection Report 84-02

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 V violation was identified as a result of an inspection conducted by your Ms. R.T. Hogan and Mr. P. Clemons during the period of January 24-27, 1984.

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

APPENDIX A

Item 10CFR71.105(d) states, "The licensee shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

Contrary to the above, licensee employees performing inspection activities affecting quality have not been trained in the licensee's transportation procedures or DOT and NRC regulatory requirements involved in the transfer, packaging, and transport of radioactive material to assure that suitable proficiency was achieved and maintained.

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RESPONSE

We disagree with this alleged violation. The Inspector is correct in that 10CFR71.105(d) states, "The licensee shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

Further definition of "activities" is required and is provided in 10CFR71.103 which states, "These activities include performing the functions associated with attaining quality objectives and the quality assurance functions. The quality assurance functions are (a) assuring that an appropriate quality assurance program is established and effectively executed, and (b) verifying by procedures such as checking, auditing, and inspection that activities affecting the safety-related functions have been correctly performed." It is our contention that indoctrination and training is provided as necessary to assure that suitable proficiency in quality assurance activities is achieved and maintained.

Licensee personnel responsible for implementing procedures or for meeting DOT or NRC regulatory requirements involved in the transfer, packaging, and transport of radioactive material are required to be trained specifically in those areas of responsibility. Personnel responsible for the inspection of such activities are indoctrinated and trained in the specifics of their respective area of activity.

10CFR71.121 states, "The licensee shall establish and execute a program for inspection of activities affecting quality by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

Our program for inspection, OOA-X-1, was established in 1975 and has been updated five times in the interim period to reflect changing needs. The inspection program is generic for essentially all activities requiring quality assurance. The inspection program is made specific to subject areas such as transportation of materials, by the inspector who reviews and incorporates the unique requirements of documents, such as plant procedures, or NRC/DOT regulatory requirements, into the inspection.

In conclusion, we believe that QA personnel are adequately indoctrinated and trained to perform inspection activities affecting quality and therefore we believe that the alleged violation is invalid and respectfully request that it be withdrawn.

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APPENDIX B

Item IE Bulletin NO. 79-19 states that licensee's should "provide training and periodic retraining in the DOT and NRC regulatory requirements, the waste burial license requirements and in your (the licensee's) instructions and operating procedures for all personnel involved in the transfer, packaging and transport of radioactive material...." In your response to IE Bulletin No. 79-19, dated September 26, 1979, you stated that "training and periodic retraining covering NRC and DOT requirements, and applicable plant procedure requirements is provided for all employees involved in the transfer, packaging and transport of radioactive material".

Contrary to the above, maintenance department technicians involved in the shipments of radioactive material in the FSV-1 casks during the period July-October 1983 had not been trained in the activities described in Procedure OP 2202, "Cask Handling Procedure for FSV-1 Cask Handling.

RESPONSE

Vermont Yankee disagrees with the Notice of Deviation. It is Vermont Yankee's policy to provide training and periodic retraining to plant personnel as necessary to assure that a task is completed safely, correctly and efficiently. The training provided to those Maintenance Technicians directly involved in shipments of radioactive materials in the FSV-1 casks consisted of the following:

1. Organized training, directed by vendor representatives and Vermont Yankee personnel, in the proper method of control rod cutting, liner loading and cask handling. Visual aids, including a video tape presentation, were utilized in this training.
2. Hands-on training in control rod cutting.
3. On-the-job training in the specific steps of OP 2202, "Cask Handling Procedure for FSV-1 Handling", provided in the form of assistance and direction by Vermont Yankee and vendor personnel during the first cask loading/handling operation.

As explained to the Inspector, documentation of this on-the-job procedural training was accomplished but in a manner which did not provide optimum accountability. In recognition of that fact, Vermont Yankee had, shortly before the start of this inspection, issued a revision to DP 0204, "Maintenance Department Training" to provide for a clearer record of future OJT activities.

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Vermont Yankee is very aware of the importance of following the detailed steps of a procedure. This is emphasized frequently to the entire plant staff. Furthermore, many of the skills required to perform this procedure are well within those skills normally possessed by qualified maintenance personnel. Accordingly, no further training is deemed necessary.

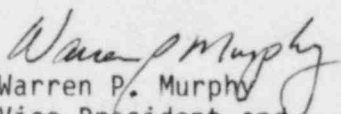
As evidence that the level of training was adequate, it should be noted that eleven shipments were made in rapid succession using the FSV-1 cask. There were no reported discrepancies associated with implementation of OP 2202.

Based on the above, Vermont Yankee considers the training given for this procedure to be sufficient. We therefore respectfully request that the deviation 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