

JUL 25 1984

Docket No. 50-271

Vermont Yankee Nuclear Power Corporation  
ATTN: Mr. Warren P. Murphy  
Vice President and Manager  
Of Operations  
RD 5, Box 169  
Ferry Road  
Brattleboro, Vermont 05301

Gentlemen:

Subject: Inspection No. 50-271/84-02

This refers to your letter dated May 8, 1984, in response to our letter dated April 2, 1984.

With regard to the violation described in Appendix A of our April 2, 1984 letter, the QA engineers performing the inspection stated that they had not received training in the licensee's radioactive material transportation procedures or the NRC and DOT regulations. Indoctrination of personnel performing these inspections must include the technical objectives of packaging and transporting radioactive material and the NRC and DOT regulations which apply. This training is specified in the Quality Assurance Program section of the Vermont Yankee Operational Quality Assurance Manual. Personnel thus trained are qualified to determine if, "activities affecting the safety-related functions have been correctly performed."

During the inspection, and in your letter, you indicated that the regulations do not require that your inspectors performing transportation inspections be trained in transportation procedures or in DOT/NRC regulatory requirements, but only require that they be trained in their respective area of activity. As you point out in your letter, 10 CFR 71.105(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." The "as necessary" is not defined in the regulations. It is our position that it is necessary for Quality Assurance Engineers performing inspections of transportation activities to be trained in the licensee's transportation procedures and the DOT/NRC regulatory requirements governing the transportation activities to assure suitable proficiency is achieved and maintained.

Therefore, pursuant to the provision of 10 CFR 2.201, Vermont Yankee Nuclear Power Corporation is hereby required to submit to this office within twenty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

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With regard to Appendix B, Vermont Yankee committed to the "training . . . covering applicable plant procedure requirements . . . for all employees involved in the transfer, packaging and transport of radioactive material. Records of this training are maintained." The Maintenance Engineer charged with the responsibility of the shipments of radioactive material in FSV-1 casks stated that a video tape had been presented by vendor representatives, which included training in handling the equipment involved in the control rod removal and cutting. This is only a portion of the areas covered in plant procedure O.P.2202. Other topics contained in O.P.2202 are maintenance of FSV-1 casks, emergency cask handling procedures, cask inspection requirements, trailer inspection requirements, leak test requirements and closing and sealing the cask. Further, the Maintenance Engineer stated that there had been no training in procedure O.P.2202 prior to the shipment. Assistance and direction by the Maintenance Engineer during preparation of a shipment does not constitute sufficient training in the applicable plant procedure. In addition, no records of training for personnel involved with these shipments were maintained and available for NRC review.

Therefore, Vermont Yankee Nuclear Power Corporation is hereby requested to submit to this office within twenty days of the date of the letter transmitting this Notice, a written statement of explanation in reply, including for each deviation: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which will be taken to avoid further deviations; and (3) the date when corrective action will be completed.

Your cooperation with us is appreciated.

Sincerely,

**Original Signed By:**

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

cc:

Mr. J. B. Sinclair, Licensing Engineer  
Mr. W. F. Conway, President and Chief Executive Officer  
Mr. J. P. Pelletier, Plant Manager  
Mr. L. H. Heider, Vice President  
Mr. Cort Richardson, Vermont Public  
Interest Research Group, Inc.  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
State of New Hampshire  
State of Vermont

Vermont Yankee Nuclear Power  
Corporation

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bcc:  
Region I Docket Room (w/concurrences)

Section Chief, DPRP

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