

December 14, 1995

Mr. Charles D. Frizzle
President
Maine Yankee Atomic Power Company
329 Bath Road
Brunswick, Maine 04011

SUBJECT: INSPECTION REPORT 50-309/95-22

Dear Mr. Frizzle:

This letter refers to your November 17, 1995 correspondence, in response to our October 20, 1995 letter.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

John F. Rogge, Chief
Projects Branch 8
Division of Reactor Projects

Docket No. 50-309

cc w/encl:

G. Leitch, Vice President, Operations
P. L. Anderson, Project Manager (Yankee Atomic Electric Company)
C. Shaw, Plant Manager
L. Diehl, Manager of Public and Governmental Affairs
U. Vanags, State Nuclear Safety Advisor
C. Brinkman, Combustion Engineering, Inc.
W. D. Meinert, Nuclear Engineer

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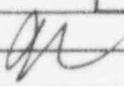
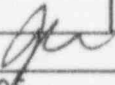
Mr. Charles D. Frizzle

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cc w/cy of Licensee's Response Letter:
J. A. Ritsher, Attorney (Ropes and Gray)
P. Dostie, State Nuclear Safety Inspector
P. Brann, Assistant Attorney General
First Selectmen of Wiscasset
D. Screnci, PAO (2)
NRC Resident Inspector
State of Maine, SLO Designee
Region I Docket room (with concurrences)
PUBLIC
Nuclear Safety Information Center (NSIC)
J. Rogge, DRP
E. Conner, DRP
M. Kalamon, DRP

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November 17, 1995

MN-95-127 JRH-95-258

UNITED STATES NUCLEAR REGULATORY COMMISSION

Attention: Document Control Desk

Washington, D.C. 20555

- References:
- a) License No. DPR-36 (Docket No. 50-309)
 - b) NRC Letter to MYAPCo dated October 20, 1995, Notice of Violation for NRC Inspection Report 50-309/95-22.

Subject: Reply to Notice of Violation Associated with NRC Inspection Report No. 50-309/95-22.

Gentlemen:

The attachments to this letter responds to the Notice of Violation contained in Reference (b). In attachments "A & B", we have restated the violations, provided our response, and have addressed our actions taken and planned to prevent recurrence.

Please contact us should you have any questions regarding this matter.

Very truly yours,



James R. Hebert, Manager
Licensing & Engineering Support Department

JVW/mwf

Attachment

- c:
- Mr. Thomas T. Martin
 - Mr. J. T. Yerokun
 - Mr. E. H. Trottier
 - Mr. P. J. Dostie

ATTACHMENT "A"

Violation "A"

Technical Specification 5.8.2 states, in part, that written procedures shall be established, implemented and maintained covering the activities referenced in (a.) Appendix "A" of Regulatory guide 1.33, (rev. 2), February 1978.

Regulatory Guide 1.33, (rev. 2), February 1978, Appendix A, Section 9, Procedures for Performing Maintenance, states, in part, that maintenance that can affect safety-related equipment should be performed in accordance with written procedures.

Maine Yankee Procedure 0-16-3, Work Order Process, requires that maintenance activities on safety class equipment shall be performed in accordance with the work package and that changes in work scope shall be reviewed and approved prior to implementation.

Contrary to the above, between March 22, and July 20, 1995, maintenance personnel performed work on safety-related check valve, CH-28 and deviated from the scope of the work order without the required approval causing an orifice to be mistakenly removed from the high pressure safety injection pump recirculation line.

Maine Yankee Response:

As stated in the Notice of Violation, the reason for the violation is as follows:

Between March 22, 1995 and July 20, 1995, Maintenance personnel performed work on safety related check valve, CH-28 and deviated from the scope of the work order without the required approval, causing an orifice to be mistakenly removed from the high pressure safety injection pump recirculation line.

Immediate Corrective Actions:

1. The worker involved with this work order was counseled on the importance of following the detailed instructions of the work package and obtaining proper approval if it becomes necessary to deviate from the guidance in the work order.
2. Mechanical Maintenance workers and supervisors have been briefed on this event with a focus on the importance of following work control guidelines, and obtaining proper approval if it becomes necessary to deviate from the guidance in the work order or procedure.
3. This event has been included in Maintenance's continuing training for the fourth quarter of 1995.

4. Corrective actions 1 and 3 of Plant Engineering Department memorandum WES-95-012 have been completed. These actions were:
- a) Field verified that all critical pump recirculation orifices are in place.
 - b) On October 30, 1995, Maintenance completed reinstallation of the High Pressure Safety Injection Pump (P-14B) recirculation orifice under work order 95-2281.

Corrective Actions Taken to Avoid Further Violation:

In addition to the actions in step 4 of the immediate corrective actions, Maine Yankee will follow up on corrective actions 2 and 4 of Plant Engineering Department memo WES-95-012. These actions are:

- a) Maine Yankee will procure and install labels on all critical pump recirculation orifices.
- b) Maine Yankee is in the process of updating controlled MKS drawings to show the critical pump recirculation orifices.

Full Compliance Date:

Full compliance was achieved on October 30, 1995, following verification that all critical pump recirculation orifices were in place and completion of P-14B recirculation orifice installation.

ATTACHMENT "B"

Violation "B"

Technical Specification 5.11, "Radiation Protection Program," Section 5.11.1, states that "procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure."

Procedure 9-3-100, "Radiation Protection Surveillance Program," Rev. 3, Section 7.6.1, states that "personnel are required to perform a hand-and-foot frisk when exiting buildings within the restricted areas to outdoor areas."

Contrary to the above, on September 13, 1995 at approximately 11:00 a.m., two individuals exited the restricted area enclosed walkway to an outside area without performing the required hand-and-foot contamination survey.

Maine Yankee Response:

Maine Yankee recognizes and promotes the importance of procedural compliance to ensure safe and efficient operation of the plant and to protect the health and safety of the plant staff and the public.

Maine Yankee provides radiation worker training to all plant and contractor personnel. This training includes stressing the importance of following procedures, as well as contamination control practices. Buildings within the Restricted Area with doors that provide access to the outside areas have a posting at each door, directing that a hand and foot frisk is required prior to exiting. To facilitate this requirement, frisking stations are conveniently located adjacent to the doors.

Contrary to the procedural requirements, and in spite of the signs and adjacent frisking stations, two unidentified individuals, for some unknown reasons, did exit the enclosed walkway to an outside area within the Restricted Area without performing the required hand and foot contamination survey.

Immediate Corrective Actions:

1. Every attempt was made to identify the offending individuals, but were unsuccessful.
2. Interim administrative controls were established effectively, reducing the number of exits to the outside available for use. Additionally, controls were put in place to require direct Radiation Protection technician involvement in use of the remaining doors to ensure compliance with the frisk requirements. (Use of all exits has subsequently restored once additional physical barriers were installed and heighten awareness to the requirements, were disseminated to site personnel.)
3. The Radiation Protection Manager (RPM) brought this issue to the morning management meeting on September 14, 1995. The RPM stressed the need to promote the company's expectations for procedural compliance with emphasis on the requirement to frisk before exit per procedure 9-3-100, "Radiation Protection Surveillance Program".

Corrective Actions to Avoid Further Violation:

1. Physical barriers comprised of a combination of ropes and swinging gates have been placed in front of each of the affected doors. A sign stating the requirement to perform a frisk prior to exiting has been attached to the gates.
2. A reminder to all plant personnel, Maine Yankee and contractor, of the requirement for compliance with Radiation Protection procedures regarding frisking within the restricted area was communicated via the Supervisory Communication Bulletin Program.
3. Maine Yankee will monitor procedures compliance performance via in-house audit program and increased use of Poor Work Practice Observation Program.

Full Compliance Date:

Full compliance was achieved on September 13, 1995 when administrative controls were put in place restricting the use of doors accessing outside areas.