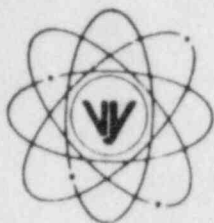


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-113

REPLY TO:
ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

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

September 24, 1984

Attention: Mr. Thomas T. Martin
Division of Engineering & Technical Programs

- References:
- a) License No. DPR-28 (Docket No. 50-271)
 - b) Letter, USNRC to VYNPC, I&E Inspection Report No. 84-02, Appendix A (Notice of Violation) and Appendix B (Notice of Deviation), dated 4/2/84
 - c) Letter, USNRC to VYNPC, I&E Inspection Report 84-06, Appendix A (Notice of Violation), dated 7/31/84
 - d) Letter, VYNPC to USNRC, FVY 84-44, dated 5/8/84
 - e) Letter, VYNPC to USNRC, FVY 84-41, dated 5/11/84

Dear Sir:

Subject: Additional Information Regarding I&E Inspection
Reports 84-02 and 84-06

This letter is written in response to I&E Inspection Reports 84-02 and 84-06 [References b) and c)] which indicated that certain of our activities were not conducted in full compliance with Nuclear Regulatory Commission requirements. This letter provides supplemental information to our May 8, 1984 [Reference d)] response to Inspection Report 84-02, our May 11, 1984 [Reference e)] response to Inspection Report 84-06, and reflects the results of a meeting we had with you and members of your staff at Region I headquarters on September 4, 1984.

Enclosure 1 provides additional information in support of our responses to the alleged violations and deviation described in the Appendices of References b) and c).

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
Warren P. Murphy
Vice President and
Manager of Operations

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PDR ADOCK 05000271
Q PDR

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VERMONT YANKEE RESPONSE TO
I&E INSPECTION REPORTS 84-02 and 84-06

INSPECTION REPORT 84-02, 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.

RESPONSE

At the September 4, 1984 meeting held at Region I headquarters, the Yankee Atomic Electric Company Operational Quality Assurance Department Manager provided an overview of the quality control and assurance for activities associated with the packaging and transportation of radioactive waste material, including the indoctrination and training of the staffs involved in these activities. The following provides a description of the three levels of quality control/assurance performed on packaging and transportation of radioactive waste material. Since the Notice of Violation was directed at the Operational Quality (QA) personnel who were performing the surveillance function, the following also provides the indoctrination and training provided to that level of Quality Assurance personnel.

Inspection Function (Level 1)

Quality control inspections by Operations personnel.

Surveillance Function (Level 2)

Quality Assurance inspections/surveillances which are performed by Operational Quality (OQ) personnel by review, observation, informal surveillance, or QA inspection to verify the plant's compliance with documented instructions, procedures, and drawings pertinent to accomplishing activities affecting quality.

Training of Operational Quality personnel is accomplished through the following methods:

- o Satisfactory completion of a Quality Assurance indoctrination and training program.
- o Satisfactory completion of Quality Assurance inspector training, including on-the-job training, in accordance with ANSI N45.2.6-1978.
- o Training by review of inspection initiating document(s) (i.e., applicable plant procedures, NRC regulations, etc.) and/or specified requirements applicable to the activity being inspected (this review is documented in the Inspection Report).
- o Specialized training, as determined by the Director of Quality Assurance, to meet special needs. Subsequent to the NRC Inspection of January 24-27, the following specialized training was provided, or is to be provided, to Operational Quality personnel. This optional training is deemed to be additional to that required to training Operational Quality personnel for surveillance function activities. The determination to provide various training in package and transportation of radioactive waste was made prior to the NRC inspection.
 - Attendance by specified personnel at a one-day seminar on radioactive waste packaging, transportation and burial - by Chem Nuclear Systems at Barnwell, South Carolina - January and February 1984.
 - Training on the revisions to the DOT and NRC regulations which went into effect in 1983 for Operational Quality personnel - by YNSD Technical Specialist - March 1984.
 - One-day training session on 10CFR71 and DOT regulatory requirements pertaining to packaging and transportation for Operational Quality personnel -by YNSD Technical Specialist - by the end of November 1984.
 - In addition, training on the regulatory requirements will be provided to new OQ personnel performing the surveillance functions and when major changes are made to the 10CFR71 or DOT regulations.

These indoctrination and training programs for surveillance personnel assure that:

- o Personnel responsible for performing quality activities are instructed as to the purpose, scope and implementation of the quality-related manuals, instructions, and procedures governing OQ activities.

- o Personnel performing quality-related activities are trained and qualified in principles and techniques of the OQ activity being performed.
- o Personnel are adequately qualified to understand the OQ implementing procedures, to verify that personnel are performing their assigned tasks, and to verify that personnel have adhered to the implementing procedures.

Audit Function (Level 3)

Quality Assurance audits which are performed by Quality Assurance personnel and Technical Specialists, as required, to verify compliance with all aspects of the Quality Assurance Program and to assess the effectiveness of the Program.

Summary Statement

The training program has been consistently used in providing the training required under Title 10 of the Code of Federal Regulations, Part 50, Appendix B, and was extended, in total, to meet the requirements of Title 10 of the Code of Federal Regulations, Part 71.105(d) and the quality assurance functions as defined in Part 71.103.

INSPECTION REPORT 84-02, APPENDIX B

ITEM

IE Bulletin 79-19 states that licensees 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 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 training in the activities described in Procedure OP 2202, "Cask Handling Procedure for FSV-1 Cask Handling".

RESPONSE

As discussed at the September 4, 1984 meeting between Vermont Yankee and the NRC at King of Prussia, the following clarification of the training given to the appropriate maintenance personnel involved in the FSV-1 cask shipments is provided.

The training provided to the appropriate maintenance department personnel involved in the FSV-1 cask shipments consisted of a combination of classroom training and hands-on, on-the-job training. The classroom training consisted of vendor instruction as follows: Eric Bradley of Torrey Pines Technology presented an overhead slide and video tape program on control rod blade cutting, liner loading and cask handling operations. One video tape described the control rod cutting operation and liner loading. For clarity, the taped presentation utilized simulated control rod; however, portions of the tape were of actual underwater control rod manipulations showing underwater handling considerations. The second video tape consisted of cask handling operations including removing the cask from the truck, rigging the redundant lifting fixture, loading the cask, and the subsequent reload of the cask onto the shipping trailer. These tapes were narrated by the vendor representative and questions brought up by Maintenance personnel were addressed. An attendance sheet for this training was filled out and remains on file.

Prior to the initial shipment, OP 2202, "Cask Handling Procedures for FSV-1 Cask Handling", was thoroughly reviewed by the designated work party. Hands-on, on-the-job training and direction was provided throughout every step and phase of the instructions included in OP 2202 for the first shipment. This training included all cask handling, loading, maintenance, inspection requirements and closing and sealing of the cask. In addition, the emergency cask handling requirements of the procedure were reviewed by the appropriate lead men with the Maintenance Engineer prior to the start of the project. Documentation of the hands-on, on-the-job training was compiled by reviewing the time sheets of the individuals assigned to the project.

As noted in our response dated May 8, 1984, VY procedure DP 0204, "Maintenance Department Training", has been revised to provide clarity in recording future OJT activities.

In view of the above, we again respectfully request that the Notice of Deviation be withdrawn.

INSPECTION REPORT 84-06, APPENDIX A

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 10CFR Part 20. Procedure Number AP 0502, "Radiation Work Permits" (Rev. 12, 9/27/83), requires, in part, specifications on radiation work permit 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 hazard control procedure), be taken for operations under these permits.

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

As discussed at the September 4, 1984 meeting between Vermont Yankee and the NRC at King of Prussia, the fundamental issue identified in the Notice of Violation (NOV) is one of insufficient documentation to provide a readily traceable history of field changes to RWP's. We do not believe, however, that our administrative controls for protection of personnel were violated, nor do we believe that our Technical Specifications were violated.

The policy for field changes to RWP's at Vermont Yankee has been and remains that protective requirements can be increased at the discretion of the Health Physics Technical assigned to cover a job, but can be decreased only with the prior concurrence of Health Physics management. This prior concurrence has frequently been verbal and undocumented, as was the case in the RWP's cited in the NOV. The NOV has prompted a reconsideration of this practice of undocumented, verbal modifications to field RWP requirements. As a result of this reconsideration, our RWP procedure will be upgraded by 11/21/84 to require more extensive documentation of exceptions to RWP requirements.

While the RWP's cited in the NOV did list a requirement for breathing zone air samples, the requirement for obtaining them was qualified by a special instruction also listed on each of the permits. This instruction was supplemented with verbal authorization from Health Physics supervision that breathing zone air samples need not be obtained when sandblasting was not in progress.

Sandblasting did not occur in the 22 occasions cited in the NOV and workers present without breathing zone air samples were in full compliance with our radiological controls established by RWP's 83-1465 and 84-93 as amended by verbal authorization from Health Physics management. Therefore, our administrative controls for protection of personnel were not violated.

In view of the above, we again respectfully request that the violation be withdrawn.