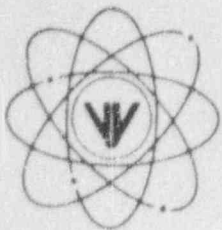


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO
ENGINEERING OFFICE
580 MAIN STREET
BOLTON, MA 01740
(508) 779-6711

December 29, 1995
BVY 95-144

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

- References:
- a) License No. DPR-28 (Docket No. 50-271)
 - b) Letter, USNRC to VYNPC, "Notice of Violation and Vermont Yankee Inspection 95-23," dated November 29, 1995
 - c) NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants" dated April 1995
 - d) "Supplement to Minutes of the Public Meetings on Generic Letter 89-04," dated September 26, 1991
 - e) "Minutes of the Public Meetings on Generic Letter 89-04," dated October 25, 1989
 - f) Letter, USNRC to VYNPC, "Vermont Yankee Inservice Test Program Inspection 95-22," dated October 22, 1995
 - g) Letter, VYNPC to USNRC, "Reply to a Notice of Violation - Inspection Report No. 50-271/95-22" (BVY 95-124), dated November 15, 1995

Subject: Reply to a Notice of Violation - Inspection Report No. 50-271/95-23

This letter is written in response to Reference b) which documents that certain activities within the Vermont Yankee Inservice Testing Program were not conducted in full compliance with NRC requirements. The violation was classified as Severity Level IV and identified as a result of an NRC inspection conducted October 3 to November 6, 1995.

VIOLATION:

10 CFR Part 50.55a(f), Inservice testing requirements, states that inservice testing of certain ASME Code Class 3 valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code (the Code) and applicable addenda. Section XI of the Code (1989 Edition) incorporates by reference Part 10 (OM-10) of ASME/ANSI OMA-1988.

OM-10a, Section 4.3.2., "Exercising Tests for Check Valves," requires, in part that stop-check valves (a specific type of check valve) be full-stroke exercised or examined in a manner which verifies obturator travel to the position required to fulfill its function. Subsection 4.3.2.4(a) states that movement shall be demonstrated by observing that the obturator travels to the seat on cessation or reversal of flow. If full-stroke exercising during power operation is not practicable, stop-check valve full-stroke exercising frequency may be limited to cold shutdowns or refueling outages.

Contrary to the above, between September 1, 1993 and November 4, 1995, stop-check valves in the reactor core isolation cooling system (V13-817) and high pressure coolant injection system (V23-842) were not examined or full-stroke tested to assure obturator travel to the closed position.

This is a Severity Level IV violation.

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Response to Violation:

Vermont Yankee does not contest this violation. Vermont Yankee concurs at the test method and the acceptance criteria identified in the applicable surveillance procedures for valves (V13-817 and V23-842) does not conclusively verify a full-stroke exercise in the closed direction as identified in subsection 4.3.2.4(a) of the Code. The subject stop check valves have a function to close promptly on cessation or reversal of flow. In accordance with the guidance identified in Reference c) (Appendix A: Positions, Questions, Responses and Current Considerations Regarding Generic Letter 89-04, Question Group 25), "If a prompt closure of these valves (stop-check valves) on cessation or reversal of flow is required to accomplish a safety-related function, closure must be verified by reverse flow testing or such other positive means as acoustic monitoring or radiography."

The test method and acceptance criteria in the applicable surveillance procedures does verify the ability of the subject stop-check valves to close by utilizing a manually operated handwheel. However, since these valves have a safety-related function to promptly close, the intent of subsection 4.3.2.4(a) is not met using this test method.

Reason for the Violation:

The causes of this violation are due to a reliance on a previous code interpretation and not entering Reference d) in our commitment tracking system for evaluation. Prior to the issuance of Reference d), industry guidance issued by the NRC in Reference e) indicated that the verification of closure capability of stop check valves by using the handwheel met the ASME Code requirements. This guidance was subsequently modified in Reference d).

Short Term Corrective Actions:

1. Vermont Yankee performed radiography of the subject valves on November 6, 1995 which verified their closure capability and compliance with the requirements of subsection 4.3.2.4(a) of OM-10.
2. A review of similar valves was performed which indicated that there are no other instances where stop check valve closure was verified by utilizing a manually operated handwheel.

Long Term Corrective Actions:

1. Vermont Yankee will continue to perform radiography of the subject valves on a quarterly basis until such time as other positive means to verify closure are identified.
2. Vermont Yankee will perform an assessment of the Operating Experience Review Program to ensure that relevant industry information (such as Reference d) is properly entered into the program and reviewed for applicability. This action is expected to be completed by 3/1/96.

Additional IST and Vermont Yankee Program Actions:

As a result of the violations identified in References b) and f), Vermont Yankee reassessed the organizational structure and management oversight of the IST and other major programs. The following are additional corrective actions being taken to prevent occurrence of similar problems in these programs.

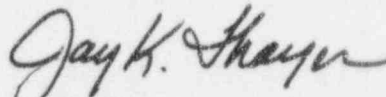
1. A self assessment of the IST program staffing levels has been completed. As a result of this assessment, many of the collateral duties of the Plant IST Coordinator have been re-assigned to other personnel so more focus can be placed on IST program issues.
2. Additional staffing has been provided to address IST program commitment backlog and to develop a more comprehensive IST program basis document.
3. Vermont Yankee has completed a detailed review of the current IST program scope to ensure compliance with the scope requirements of ASME/ANSI OMa-1988 Parts 1, 6 and 10.
4. The Vermont Yankee Engineering Department has been reorganized to improve the focus of the engineering organization. Specific program responsibilities for the Engineering Department have been more clearly defined and clear expectations for Vermont Yankee program owners have been established.
5. A self assessment of the Quality Assurance functions has been completed which identified additional opportunities to improve Vermont Yankee's ability to self identify similar problems. We will continue to perform additional assessments of program performance during 1996 using the self assessment program and the Quality Assurance organization.
6. Vermont Yankee will perform additional benchmarking of other utilities with strong engineering program performance to develop a model for program implementation at Vermont Yankee. It is expected that this will be completed by 06/01/96.
7. Vermont Yankee has initiated a complete upgrade of the existing IST program basis document. The intent of this effort is to provide the basis for including components or excluding components from the IST program. Additionally, the upgraded basis document will define the basis for the testing performed and the acceptance criteria applied, for each component. This action is expected to be completed by 10/1/96.

The Vermont Yankee IST program was in full compliance with NRC regulations for the subject valves when radiography was completed on 11/06/95. As identified in Reference g), Vermont Yankee expects that the IST program will be in full compliance with NRC regulations by 10/01/96.

We trust that the enclosed information is satisfactory; however, should you have any questions or desire additional information on this issue, please do not hesitate to contact us.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Jay K. Thayer
Vice President, Engineering

cc: USNRC Regional Administrator, Region 1
USNRC Resident Inspector, VYNPS
USNRC Project Manager, VYNPS