

NOV 27 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
Brattleboro, Vermont 05301

Gentlemen:

Subject: Inspection 50-271/84-10

This refers to your letter dated August 9, 1984, in response to our letter dated July 12, 1984. Thank you for informing us of the corrective and preventive measures documented in your response. These actions will be examined during a future inspection of your licensed program.

The violation concerned a failure by Instrument & Control (I&C) technicians to complete a calibration of the torus narrow range level channels in accordance with the instructions of OP 4374. In your response, you disagreed that an actual violation of OP 4374 occurred since the actions by I&C personnel to postpone the completion of the calibration until the following day was not specifically disallowed by the procedure. You stated that previous experience with that particular calibration showed it was customary to defer final verification that the instruments were properly returned to service for about 2 hours until after thermal stabilization of the reference legs could be assured.

We agree that the circumstances particular to the torus level channels necessitate a wait period for thermal stabilization prior to final verification that the channels were properly returned to service. Two hours is sufficient to assure thermal stabilization and it would be proper to observe this wait period as part of the OP 4374 instructions. We believe that the actions to defer the final check to the next day was not only unnecessary to assure thermal stabilization, but also excessive.

However, the length of the wait period was not the point of the violation, nor does it characterize the concern we had in bringing this matter to your attention. Our concerns regarding the activities on May 8, 1984 involve the incomplete and informal manner in which test activities were terminated following the calibration, which left the duty Shift Supervisor unaware of the status of testing, and unaware of the status of instruments important to safe operation of the plant. Further, the high pressure coolant injection suction valves were found out of normal alignment after 4:00 p.m. by operations personnel during shift checks. These valves were apparently out of position as a result of the incomplete status of OP 4374.

We believe that your management directives in OP 4374 were violated because the procedures does not explicitly allow stopping the test and deferring final verifications. Whether a test is stopped at the end, middle or beginning, we consider it a violation of the procedure requirements and your management directives if the

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proper notifications are not made to shift supervision regarding the status of testing and plant equipment, or if the restoration to service checks are not performed as required by the procedure. If the procedure cannot be completed as written, your administrative controls require that, as a minimum, the department supervisor be notified to concur in the manner of terminating testing activities. Your administrative controls further require that procedures be changed in accordance with established policies if they cannot be completed as written. We note that neither of the above actions were taken on May 8, 1984.

While no further actions appear to be necessary in response to the present item, we are concerned that your response does not appear to support a position which states that management's directives and procedures must be either rigorously followed as written (unless doing so would jeopardize plant or personnel safety), or changed in accordance with the established administrative policies.

Based on the above, the violation is not withdrawn.

Sincerely,

Original Signed By:

Richard W. Starostecki, Director
Division of Project and Resident Programs

- cc:
- Mr. R. W. Capstick, Licensing Engineer
- Mr. W. F. Conway, President and Chief Executive Officer
- Mr. J. P. Pelletier, Plant Manager
- Mr. Donald Hunter, 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

- bcc:
- Region I Docket Room (with concurrences)
- DPRP Section Chief

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RI:DPRP

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RI:DPRP

for Raymond/meo
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for Tripp

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Wenzinger
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