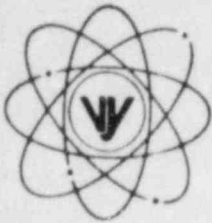


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-99

REPLY TO:
ENGINEERING OFFICE

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

August 9, 1984

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

Attention: Richard W. Starostecki, Director
Division of Project & Resident Programs

References: a) License No. DPR-28 (Docket No. 50-271)
b) Letter, USNRC to VYNPC, dated 7/12/84, and
Inspection Report No. 84-10, Appendix A
Notice of Violation

Dear Sir:

Subject: Response to Inspection Report 84-10

This letter is written in response to Reference b) which indicates that one of our activities was not conducted in full compliance with Nuclear Regulatory Commission requirements. This alleged Level V violation was identified as a result of an inspection conducted by your Mr. W. Raymond during the period of May 8 - June 4, 1984.

Information is submitted as follows in answer to the alleged violations contained in the Appendix to your letter.

ITEM

- A. Technical Specification (TS) 5.5.A requires that detailed written procedures, including applicable check-off lists, be prepared, implemented and followed. Procedure OP 4374 was written pursuant to the above to provide for the periodic calibration and testing of the torus level instrument channels. OP 4374 requires that certain checks be completed and notifications be made to secure from testing following the completion of a channel calibration.

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PDR ADDCK 05000271
Q PDR

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Contrary to the above, testing activities were terminated at 3:45 p.m. on May 8, 1984 following a calibration of the torus level instruments and the following actions were not completed in accordance with OP 4374: recording the final torus level indication to verify it was proper; verifying the high pressure coolant injection pump suction valves were returned to the proper standby alignment; notifying the Shift Supervisor of the test results and the status of testing; and obtaining the Shift Supervisor's review and concurrence that the test results were acceptable.

This is a Severity Level V Violation (Supplement I.E.).

RESPONSE

Calibration of the torus level instrumentation started at 2:45 p.m. on May 8, 1983 and proceeded in accordance with OP 4374. By 3:25 p.m. testing up to Step 11 of the procedure had been completed and signed off. Additionally, although not signed off at this time, 1) narrow range level instrument readings taken by test personnel at 3:30 and again at 3:45 were found to be satisfactory, and 2) the acceptable condition of annunciators and relays was verified. The system, including the HPCI suction valves, was then returned to an on-line status, with notification made to a Control Room authority at 3:45 p.m.

As is customary and prudent, sign-off of steps 11 through 13 (which includes a final verification that the instruments have been satisfactorily returned to service) was deferred until thermal stabilization of the reference legs could be assured (normally about 2 hours).

Due to the fact that calibration began late in the day, stabilization would not have occurred until after the end of the shift. Completion of the procedure was therefore postponed until the following day. OP 4374 does not disallow this; consequently, Vermont Yankee disagrees that a violation of our calibration procedure actually occurred. We do, however, agree that poor judgement was exercised and that corrective steps should be taken to prevent similar situations from occurring.

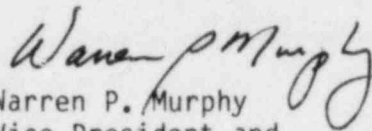
As a result, OP 4374 has been changed to include specific instructions for the Torus Water Level Function Test calibration to preclude a recurrence of this event. In addition, instruction was given to foremen and assistant foremen concerning this issue, with emphasis placed on the importance of knowing the status of equipment at the end of each shift and prior to releasing the system to operations. Similar discussions were held at department meetings to ensure that technicians and supervisors were made aware of their responsibilities during and after Surveillance Testing.

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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
Vice President and
Manager of Operations