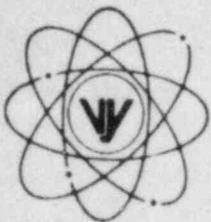


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

November 21, 1984

FVY 84-136

(802) 257-5271

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

Attention: Mr. Edward C. Wenzinger, Chief
Projects Branch No. 3
Division of Project and Resident Programs

- References:
- (a) License No. DPR-28 (Docket No. 50-271)
 - (b) Letter USNRC to VYPNC, dated
October 24, 1984, I + E Inspection
Report 50-271/84-18
 - (c) Letter, USNRC to VYPNC, dated
October 11, 1984, I + E Inspection
Report 50-271/84-20
 - (d) Letter, USNRC to VYPNC, dated
June 8, 1984, I + E Inspection Report 50-217/84-08

Subject: Response to I + E Inspection Report 50-271/84-18

Dear Sir:

This letter is written in response to Reference (b), which indicates that certain of our activities were not conducted in full compliance with Nuclear Regulatory Commission requirements. The alleged violation, classified at Severity Level IV, was identified as a result of an inspection conducted by the NRC Resident Inspector on July 17, 1984.

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

Finding

Technical Specification (TS) 6.5.A requires that detailed written procedures, including applicable check-off lists, be prepared, implemented, and followed. Procedures OP 2123 and OP 2124 were written pursuant to the above to specify the required valve lineup for the Core Spray (CS) and residual heat removal service water (RHRSW) systems, respectively, during plant operations.

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OP 2123 requires that Core Spray pressurization valve CS-35A be open during routine plant operations. OP 2124 requires that RHRSW pump cooling water valves RHRSW-175 XC and RHRSW-180 XD be open during routine plant operation.

Contrary to the above, Core Spray pressurizing valve CS-35A was found closed at 12:35 p.m. during routine plant operations at 15% full power (FP) on August 14, 1984.

Contrary to the above, RHRSW-175 XC was found one-half turn open, and RHRSW-180 XC was found 1-1/2 turns open at 5:05 p.m. during routine operations at 80% FP on August 30, 1984.

This is a Severity Level IV Violation (Supplement I.D.)

Response

The circumstances surrounding the two valve lineup errors described in Appendix A of Inspection Report No. 50-271/84-18 has resulted in the following corrective action:

Actions Taken

The subject of management controls put in place by procedures, has been discussed by the Operations Supervisor with his staff at meetings conducted on 9/13/84, 9/20/84 and 10/18/84. At these times it was emphasized that the valve lineup appendices are an integral element of procedures and as such, require the same level of attention. In addition, discussions held at the Shift Supervisor and Senior Control Room Operator level stressed the need for an awareness of the impact interim valve configurations have on plant systems, as well as the degree of detail required when giving specific instructions for equipment manipulation.

Additional Actions Planned

- 1) An examination of the related systems descriptions has revealed that insufficient information exists on the normal means of Low Pressure Cooling System Pressurization. Since this description is utilized extensively during initial operator training, it will be revised by June 1, 1985 to provide greater detail.
- 2) The Valve Lineup Control Procedure (AP 0155) is under review to re-evaluate its adequacy of scope. It is expected that any revision found necessary will be implemented by February, 1985. In addition, this procedure will be added as a specific topic addressed during the 1985 Operator Requalification.
- 3) As new revisions to procedures for certain safety system valve/breaker lineups are issued, the status of accessible components will be re-verified.

- 4) Quarterly valve lineups of certain safety related valves and breakers (where accessible) will be performed to determine the effectiveness of the controls put in place by AP 0140 and AP 0155. This additional surveillance of lineups will continue for at least one year at which time the need for further surveillance will be evaluated.

In addition to the above stated actions, various program enhancements are underway in response to the violations identified in I + E Inspection Report 84-20. One previously stated action of particular note is that the existing level of controls contained in AP 0140 is under review to ensure adequacy.

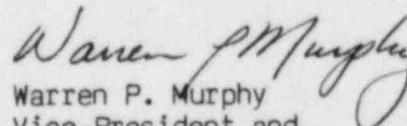
As requested in Reference (b), Vermont Yankee Procedure AP 0140, (Vermont Yankee Local Control Switching Rules) is under review to determine whether the implementation of Administrative controls as imposed by the procedure, is sufficient in view of the circumstances identified in references b, c, and d. Specifically by March 1, 1985, AP 0140 will be evaluated and necessary changes made to insure:

- 1) An adequate level of caution tag control exists when in an interim operating configuration.
- 2) When caution tags are cleared, the restoration position for each component is consistent with plant status.
- 3) Emphasis is placed on determining and recording the normal position of the component that has been white tagged, on the "Tagging Order Record Form" (VYAPF 0140.3).

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