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REPLY TO
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June 26, 1992
BVY 92-072

U.S. 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, NVY 92-087, Inspection Report 92-08, dated 5/28/92

Dear Sir:

Subject: Reply to a Notice of Violation, Inspection Report 92-08

This letter is written in response to Reference b), which indicates that one of our activities was not conducted in full compliance with NRC requirements. The apparent violation, classified as a Severity Level IV, was identified during a radiological controls inspection conducted on April 13-17, 1992. Our response to the violation is provided below.

VIOLATION

Technical Specification (TS) 6.5.B requires, in part, that "Radiation control standards and procedures shall be prepared, approved and made available to all station personnel. These procedures shall show permissible radiation exposure, and shall be consistent with the requirements of 10 CFR Part 20". 10 CFR Part 20.103 (c) describes, in part, that the licensee may make allowance for this use of respiratory protective equipment in estimating exposures to individuals provided that the licensee maintains and implements a respiratory protection program that includes as a minimum written procedures regarding selection, fitting and maintenance of respirators and written procedures regarding supervision and training of personnel.

1. Station Procedure AP 0505, "Respiratory Protection" required, in part, that "Replacement of parts or repair will be performed by personnel who have received documented training in the maintenance of the subject equipment".

2. Station Procedure AP 0505, described respirator maintenance and filter testing procedures using the PortaCount particle counting device in the "fit test" mode of operation.

3. Station Procedure DP 0539, "Radiation Protection Department Contractor Training Program" required that, for Junior Radiation Protection Technicians (JRPTs), "An oral or written exam shall be administered by the Training Department. The completed exam will be retained as documentation of training".

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Contrary to the above:

1. Station practices were not in accordance with AP 0505. Specifically, the contract Senior Radiation Protection Technician (SRPT) who performed replacement of parts and repairs on respirators did not have documented training in those subject activities. Documentation of training was only performed after inspector identification on March 29, 1992. Interviews with plant personnel indicated that the SRPT had performed repair and part replacement on several occasions prior to March 29, 1992.

2. Respirator filter testing was not being performed using the PortaCount unit in the "fit test" mode as described in Station Procedure AP 0505. On April 15, 1992, the inspector observed technicians performing filter tests using the PortaCount unit in the "count" mode. Interviews with station personnel indicated that the "count" mode had been used since about midway through the 1992 refueling outage. Use of the "count" mode was not described in station procedures.

3. Neither oral or written examinations were administered to some JRPTs by the Training Department covering respirator repair and testing. According to licensee personnel, specific training on use of respiratory protection test equipment was performed by a contract Senior Radiation Protection Technician (SRPT). However, the SRPT is not a member of the Training Department, examinations were not administered and the training given by the SRPT was not documented. On April 15, 1992, the inspector observed JRPTs who were confused about the operation of the PortaCount test equipment and clearly did not understand the basic operation of the PortaCount unit.

These examples in the aggregate constitute a Severity Level IV violation (Supplement V).

RESPONSE:

The cause of the non-compliance issues was inadequate implementation of existing procedures. This has been attributed to a lack of attention to detail by the front line supervisors tasked with directing the RP technicians involved, and to some confusion involving imprecise procedural language.

Immediate steps have been taken to ensure that all respiratory equipment is in proper working condition. This was accomplished by having the contract Senior Radiation Protection Technician (SRPT) perform all of the repair tasks associated with respirators under the supervision of the Vermont Yankee supervisor responsible for this area. No weaknesses in knowledge or ability of the SRPT were observed. Thus it has been concluded that the previous repair tasks were also properly completed.

All required documentation for the SRPT has been developed and filed in accordance with prescribed procedures. Additionally, we have confirmed that the respiratory training tasks and documentation which are required for in-house technicians, are also required for contractor technicians. The contractor training procedure has been revised to ensure that the responsibilities for

training and documentation are clearly stated. This procedure now lists the specific On-the-Job Training tasks required for Junior and Senior contract Radiation Protection Technicians.

All use of the "count rate" mode of the filter test unit has been discontinued and no use of this mode will be allowed until proper evaluations are conducted and procedural changes implemented. Additionally, a Corrective Action Report (CAR 92-17) has been developed for this specific issue. This CAR, with its specified corrective actions and follow-up verifications has been reviewed by the Plant Operation Review Committee (PORC) and subsequently approved by the Plant Manager. This report requires additional procedural changes to be completed by July 30, 1992.

The supervisor involved was counseled on the importance of compliance with all applicable procedures, policies and the correct method to initiate changes, if necessary.

In addition, the Vermont Yankee Radiation Protection Department has developed a broad program for improving our procedural compliance and "attention to detail". This program is centered on a new self-audit process in the RP Department, styled after the existing Quality Assurance program, where the front line supervisors are required to develop and implement a formal audit of specific areas. This program is designed to discover and remedy problems, and to reinforce compliance with all procedures. Problem areas will be formally addressed through our Radiation Protection Incident Report process and all findings will be considered for inclusion into the Radiation Protection Technician Continuing Training Program. The first draft of this program has been issued and the first audit will be completed by July 30, 1992. Following completion of the audit, the final program will be distributed to all Radiation Protection Supervisors. This will be completed no later than August 30, 1992.

This violation and the corrective actions to prevent recurrence, will be reviewed in the 1992 Continuing Training Program for Radiation Protection personnel.

We believe that the actions proposed are responsive to your concerns; however, should you have any further questions, please do not hesitate to contact us.

Very truly yours,

Vermont Yankee Nuclear Power Corporation

Warren P. Murphy
Senior Vice President, Operations

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