

NOV 05 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  
Ferry Road  
Brattleboro, Vermont 05301

Gentlemen:

Subject: Inspection 50-271/84-05

This refers to your letter dated June 1, 1984, in response to our letter dated May 2, 1984.

We reviewed your response and found that it did not adequately address the issues identified by our inspection. Specifically, the change to the normally open position of the RCIC 20 valve, made by shift personnel to stop system pressurization due to leakage through downstream isolation valves, constituted an unreviewed and unapproved change of intent from the valve lineup proscribed by OP 2121. The change was made by shift personnel under the provisions of AP 0155 as a 'change in valve lineup dictated by changes in system status'. Your controls as implemented in the RCIC 20 example failed to assure that a proper control logic test was conducted for operation with the valve in the closed position. Inspection Report (IR) 84-05 discusses the safety implications of the unreviewed valve position change, and describes how the present AP 0155 controls which are implemented at VY in such a manner to allow for such valve lineup changes do not meet the intent or explicit requirements of Technical Specification 6.5.A and 6.5.D.

Your response takes credit for prior NRC reviews of AP 0155 as a basis for a conclusion that the controls in AP 0155 were acceptable to the NRC and in conformance with the technical specifications. Your position is inconsistent with our understanding of Technical Specification 6.5.A requirements for the reasons discussed in IR 84-05 and constitutes what we believe is an improper application of the AP 0155 requirements, which if implemented as in the RCIC 20 example, violates the control, level of review, and delegation of authority requirements intended by the technical specifications. Based on our review of the inspection references, we determined that, in our previous reviews and acceptance of AP 0155, we never envisioned that the words in AP 0155 would be interpreted in the manner you have stated and applied them.

Following a previous inspection (IR 80-22) of valve lineup changes made during the performance of a containment leak rate test, we did concur with a definition of 'exceptions' to OP 4029 valve lineups as "...temporary changes to the status of plant equipment that do not change the intent of the activity in progress or affect safe operation of the facility". This provision was agreed to under the context of its use during the leak rate test, where changes to valve lineups prescribed by OP 4029 were desirable due to changes in the plant conditions that were dictated by another approved procedure, OP 2170, to provide an alternate

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(and equally acceptable) configuration in the condensate system, as requested by the shift supervisor. We understood that 'exceptions' taken to the OP 4029 valve lineup as being required by changes 'dictated by system status' to simply mean that one approved operating procedure had preference in directing the valve positions needed to establish the desired plant conditions to conduct the test, and such changes, if the changes met the above definition, they could be made under the authority of the senior licensed shift personnel.

Following an inspection (IR 80-19) of the implementation of the AP 0155 controls for establishing and maintaining records of the status of system valves, we agreed to the corrective actions described in FVY 81-42 dated March 16, 1981. This letter stated that you would specifically limit 'exceptions' to valve lineups prescribed by approved operating procedures to those that 'must be different as dictated by system status'. We accepted this action based on our understanding of the actions taken for OP 4029 as described above. We assumed that valve lineup changes 'dictated by changes in system status' would in turn be directed by other approved operating procedures. We never intended to agree that an 'exception' made to an approved system valve lineup that was not in turn prescribed by another approved procedure was an acceptable means to implement the requirements of technical specification 6.5. More specifically, an unreviewed, unapproved 'exception' to a system valve lineup used to circumvent a maintenance problem was never equated with a 'change dictated by system status'.

We are concerned that your response to this item did not address issues we raised that clearly point out weaknesses in your administrative controls that, if left uncorrected, could result in unreviewed, unapproved changes in plant operations and which could result in significant operational safety concerns. We further note that, based on a discussion between the plant manager and our inspector on October 10, 1984, and contrary to the assertions in your response, no actions have been taken to re-evaluate the criteria specified in AP 0155 to determine the desirability of enhancing the procedure.

Therefore, pursuant to the provisions of 10 CFR 2.201, Vermont Yankee Nuclear Power Corporation is hereby required to submit to this office within twenty days of the date of this letter a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

Your cooperation with us is appreciated.

Sincerely,

*Original Signed EXL*

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

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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)  
 Senior Operations Officer (w/o encls)  
 DPRP Section Chief  
 DPRP Branch Chief

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OFFICE	RI:PBS 3A.VY	RI:PBS 3A	RI:PB 3	RI:DPRP		
SURNAME	W.Raymond/el	L.E. Tripp	E.Wenzinger	R.Starostecki		
DATE	10/29/84	10/30/84	10/31/84	11/4/84		