

# VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-56

REPLY TO:

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

June 1, 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 and Resident Programs

References: a) License No. DPR-28 (Docket No. 50-271)  
b) Letter, USNRC to VYNPC, dated 5/2/84, and Inspection  
Report No. 84-05, Appendix A (Notice of Violation)

Dear Sir:

Subject: Response to Inspection Report 84-05

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 IV violation was identified as a result of an inspection conducted by your Mr. Raymond during the period of February 28 - April 2, 1984.

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

Item: Technical Specification (TS) 6.5.A requires that detailed written procedure, including applicable check-off lists, be prepared and reviewed and approved by the Plant Manager and the Manager of Operations. Technical Specification 6.5.D states that temporary changes may be made to procedures prepared in accordance with TS Section 6.5.A provided the changes do not change the intent of the original procedure and the changes are made with the concurrence of two individuals holding a senior reactor operator license. Such changes shall be documented and subsequently reviewed by the PORC and approved by the Plant Manager. Plant administrative procedures AP 0831 and AP 0832 were written pursuant to the above to implement the requirements of Technical Specification 6.5.A and 6.5.D.

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Contrary to the above, as of March 22, 1984, Section A.3 of administrative procedure AP 0155, Rev. 7, promulgated controls that were inconsistent with the requirements of Technical Specification 6.5 by allowing changes to the plant operational status without the level of pre-implementation reviews of such changes otherwise required by the specifications. Specifically, AP 0155 allowed changes to be made to safety system valve lineups described as check-off lists in approved operating procedures, without requiring a revision to the approved procedure be made for those changes that constituted a change of intent from the original procedure, or requiring that a Department Instruction be processed in accordance with AP 0832 for those changes that do not involve a change in intent.

Response:

We disagree with the alleged violation.

AP 0155, "Valve Identification and Current Valve Lineup", has been the subject of several inspection reports, (e.g., IR 50-271/77-09, IR 50-271/80-19 and 50-271/81-19).

In Inspection Report 77-09, the Inspector sampled many facility procedures (including AP 0156, Rev. 3) in order to verify that, among other items, the format and content were in conformance with the appropriate Technical Specifications. During this review, no discrepancies were identified. It should be noted that AP 0155, Rev. 7 (the subject of the alleged violation) originated from AP 0156. As such, the wording in the relevant procedural steps is nearly identical.

As we committed in our March 16, 1981 response to the findings of IR 80-19, AP 0155 was revised to include criteria for determining what constitutes an exception to the valve lineup check list. The criteria used for exceptions in AP 0155 were similar to those developed for OP 4029 (reference NRC letter to VY, dated 4/28/81). AP 0155 was subsequently reviewed by the NRC (reference IR 81-19) and apparently found satisfactory since the open findings were closed without comment. More specifically, the 81-19 inspection stated in part that: "AP 0155 now limits exceptions to valve positions to those that must be different as dictated by system status." Since the repositioning of RCIC 20 was due to system status, the repositioning of the valve as an exception was based on criteria which was clearly acceptable to the Commission.

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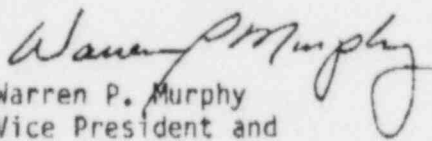
Based on the above information and the apparent concurrence from the NRC that the philosophy established by the previous Inspection Reports, was acceptable, we respectfully request that the violation be withdrawn.

While we strongly feel that the provisions of AP 0155 are in conformance with Technical Specifications, Vermont Yankee will re-evaluate the criteria specified in AP 0155 by October 31, 1984 to determine the desirability of enhancing the procedure beyond the requirement of Technical Specifications.

We trust the above information will be satisfactory; however, should you have any questions or desire further information, please do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

  
Warren P. Murphy  
Vice President and  
Manager of Operations

WPM/dm