

June 19, 1996

EA No. 96-171

Mr. Donald Reid
Vice President, Operations
Vermont Yankee Nuclear Power Corporation
RD 5, Box 169
Ferry Road
Brattleboro, Vermont 05301

SUBJECT: NRC INTEGRATED INSPECTION REPORT 50-271/96-05 AND
NOTICE OF VIOLATION

Dear Mr. Reid:

On May 11, 1996, the NRC completed an inspection at your Vermont Yankee reactor facility. The enclosed report presents the results of that inspection.

During the 6-week period covered by this inspection period, your conduct of activities at the Vermont Yankee facility was generally characterized by safety-conscious operations, sound engineering and maintenance practices, and careful radiological work controls.

Your radioactive gaseous effluent control and radiological environmental monitoring programs were inspected during this period with emphasis in the area of advanced off-gas (AOG) system operation. The inspector noted proper functioning of the AOG system as reflected in a review of past effluent releases and environmental monitoring records. Effluent release and environmental monitoring programs were found to be of high quality and effectively implemented.

We are concerned regarding the continuation of problems with the Emergency Operating Procedures (EOPs) and the slow progress in correcting such problems. We note that your efforts have identified many of the issues, e.g., Event Report 96-030, and that the EOPs appear to have retained the general capability to control and mitigate events. Nonetheless, the number of errors, inaccuracies, and issues within the EOPs and the slow resolution of such problems have reduced unnecessarily the assurance of proper EOP action. Accordingly, we plan to further inspect the accuracy and acceptability of the EOPs. We request that you provide a written response to this letter addressing your assessment of the EOP problems, your schedule for correcting the problems, and an appropriate time for a follow-up inspection of the EOPs.

The inspectors concluded, to date, you have implemented an acceptable Generic Letter 89-10 program to verify the design-basis capability of safety-related motor operated valves (MOV) at Vermont Yankee. The NRC staff will consider

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closure of our review of your GL 89-10 program upon receipt of your response to the enclosed Notice of Violation along with a status of your commitment activities discussed in this report.

During the interim exit meeting on April 5, 1996, and in your letter to the NRC dated April 18, 1996, (BVY 96-52) you committed to the following activities:

- (1) Vermont Yankee will complete evaluation of non-dynamically tested MOVs in accordance with Attachment 6 of "Engineering Guideline for Evaluation of Motor-Operated Valve Design-Basis Capability," by July 1, 1996.
- (2) Vermont Yankee will review the Safety Evaluation Report (SER) of the Electric Power Research Institute (EPRI) Performance Prediction Method (PPM), issued on March 15, 1996, for inclusion in your MOV program. This review will be completed within six months of issuance of the SER.

In addition, we understand that Vermont Yankee will evaluate a number of MOVs using the EPRI PPM. Of the nineteen risk significance Individual Plan Examination (IPE) valves, fifteen will be dynamically tested by the end of 1996. Of the four remaining valves, two have considerable margin and, therefore, will not be included in the licensee's PPM evaluation. Two IPE valves (V13-21 and V23-21) and the six valves identified in Generic Letter 89-10, Supplement No. 3 will be evaluated using the PPM. We noted that VY plans to complete the evaluation of these eight MOVs by the end of 1996. However, you will also ensure that the methodology used has an adequate broad sample size for the PPM evaluation.

The violations identified in the enclosed inspection report reflect examples of both a past and present lack of rigor in the engineering programs and processes at Vermont Yankee. We are aware of your recent re-organization and management changes, but remain concerned that overall performance, as reflected by these issues, has not markedly improved. Based upon these recently dispositioned issues, please address in your response to the Notice of Violation any broad-based initiatives the engineering staff has implemented or planned to bolster performance.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practices," a copy of this letter and the enclosed Notice will be placed in the NRC Public Document Room.

Sincerely,
Original Signed By:

Richard J. Conte, Chief
Reactor Projects Branch 5
Division of Reactor Projects

Docket No. 50-271

Enclosures:

1. Notice of Violation
2. NRC Inspection Report 50-271/96-05

cc w/encl:

R. Wanczyk, Plant Manager

J. Thayer, Vice President, Vermont Yankee Nuclear Power Corp.

J. Duffy, Licensing Engineer, Vermont Yankee Nuclear Power Corporation

J. Gilroy, Director, Vermont Public Interest Research Group, Inc.

D. Tefft, Administrator, Bureau of Radiological Health, State of New Hampshire

Chief, Safety Unit, Office of the Attorney General, Commonwealth of
Massachusetts

R. Gad, Esquire

G. Bisbee, Esquire

T. Rapone, Massachusetts Executive Office of Public Safety

State of New Hampshire, SLO Designee

R. Sedano, State of Vermont, SLO Designee

Commonwealth of Massachusetts, SLO Designee

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