

NOTICE OF VIOLATION

Vermont Yankee Nuclear Power Corporation  
Vermont Yankee Nuclear Power Station

Docket No. 50-271  
License No. DPR-28

During an NRC inspection conducted from March 25, to May 11, 1996, four violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," (60 FR 34381, June 30, 1995), the following violations were identified:

- (A) 10 CFR 50, Appendix B, Criterion XIV, Inspection, Test, and Operating Status, states, in part, that measures shall be established for indicating the operating status of systems and components, such as tagging valves or switches, to prevent inadvertent operations.

Vermont Yankee Administrative Procedure (AP)-0140, Vermont Yankee Local Control Switching Rules, Revision 19, provides the procedural guidance to ensure the safety of personnel and equipment to maintain system integrity. AP-6001, Installation, Test and Special Test Procedures, Revision 19, provides controls and guidance in the development and implementation of Installation and Test (I&T) Procedures and references AP-0140. AP-6001, steps 2 and 3 specify that the operations staff will review the impact on the equipment that must be removed from service or degraded and the impact the I&T procedure may have on other plant equipment.

Contrary to the above, the development and review by the cognizant engineering and operation staffs of step 7.6 of I&T Procedure for EDCR 95-408, HPCI Turbine Push-Button, dated 11/30/95, failed to recognize that the removal of fuses 23A-F1 and 23A-F2 on December 7, 1995 would: 1) result in the automatic opening of torus to HPCI suction valves; and 2) cause the Technical Specifications (TS) 3.7.D.2 primary containment isolation system Limiting Condition for Operating entry conditions to be satisfied because of inoperable logic circuits for HPCI isolation.

This is a Severity Level IV violation (Supplement I)

- (B) 10 CFR 50, Appendix B, Criterion XI, Test Control, states, in part, that a test program shall be established to assure that all testing required to demonstrate that systems and components will perform satisfactorily in service.

10 CFR 50.55 a(g)(1) specifies that the Inservice Inspection requirements for boiling water reactors must satisfy the requirements of Section XI of the effective edition of the ASME Boiler and Pressure Vessel Code and Addenda.

The 1980 edition of ASME Code, Section XI, sub-section IWC 5000, specifies that a demonstration of an open flow path for open-ended piping shall be conducted.

Contrary to the above, during the second interval of the Vermont Yankee Inservice Inspection Program (May 1, 1983 to September 1, 1993) the containment spray header in the torus, a subsystem of the residual heat

removal system, was not tested to demonstrate a flow path through the open-ended spray header nozzles.

This is a Severity Level IV violation (Supplement I)

- (C) 10 CFR Part 50, Appendix B, Criterion VI, states, in part, that measures shall be established to control the issuance of documents, such as procedures and instructions, which prescribe all activities affecting quality.

Vermont Yankee AP-6805, Revision No. 19, states that the control document system ensures that critical documents in use throughout the plant are always current.

Contrary to above, prior to March 29, 1996, the Vermont Yankee Motor-Operated Valve Program Manual [a critical document] was not a controlled document maintained in accordance with AP-6805.

This is a Severity Level IV violation (Supplement I)

- (D) 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, states, in part, that measures shall be established to assure conditions adverse to quality such as non-conformances are promptly identified and corrected.

Vermont Yankee AP-0009, Event Reports, Revision 1, provides guidance for the preparing and processing of Event (including non-conformance related events involving safety-class structures determined not to be in conformance with required codes, standards, or regulatory requirements) Reports requiring immediate department head and/or operations shift supervisor review to address issues potentially reportable or impacting systems or component operability.

Contrary to the above, the identification of the station battery room block wall seismic qualification non-conformance with NRC approved acceptance criteria on March 6, 1996 was not formally entered into the VY corrective action process of AP-0009 until March 12, 1996 (six days later) for the shift supervisor to initiate a station battery operability assessment. In addition, as documented in LER 96-08, dated April 4, 1996, action to correct this non-conforming condition was not planned to be completed for approximately one year.

This is a Severity Level IV violation (Supplement I)

Pursuant to the provisions of 10 CFR 2.201, Vermont Yankee is hereby required to submit a written statement of explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of the Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps

that have been taken and the results achieved, (3) corrective steps that will be taken to avoid further violation, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending this response time.

Dated at King of Prussia, Pennsylvania  
this 19th day of June 1996.