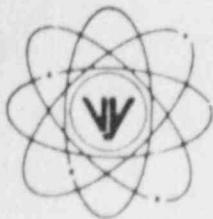


# VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 88-69

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

August 26, 1988

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Document Control Desk

References: a) License No. DPR-28 (Docket No. 50-271)  
b) Letter, USNRC to VYNPC, NRY 88-114, Inspection Report  
No. 50-271/88-05, dated 6/21/88

Dear Sir:

Subject: Response to Inspection Report No. 50-271/88-05

This letter is written in response to Reference b), which characterizes some of your findings as program weaknesses. These items were identified as a result of a Safety Assessment Team inspection conducted by Mr. C. Anderson on April 4-8, 1988, at Vermont Yankee Nuclear Power Station, Vernon, Vermont, and Yankee Atomic Electric Company, Framingham, Massachusetts.

Information is submitted as follows with regard to corrective actions taken and/or planned for items identified as program weaknesses.

ITEM 1 The respirator program does not require penetration testing of respirator filter cartridges prior to use.

## Response

The concerns identified by the inspector regarding the testing performed on filter cartridges for respirators have been addressed. Based on the information in the Inspection Report and subsequent telephone conversation clarifications with Mr. R. Loesch of the NRC, Plant Procedure AP 0505, "Respiratory Protection", was revised. This revision includes a differential pressure test for filter canisters with an upper and lower limit and a filter efficiency test on particulate filters. The procedure revision also prohibits the re-use of charcoal canisters. These implemented changes are responsive to the concerns identified in the Inspection Report and will verify the integrity of reused filter units.

ITEM 2 There is a lack of aggressiveness to address deficiencies in procedures in the Radiation Protection Area.

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### Response

This Inspection Report identifies our deliberateness in developing and implementing a hot particle procedure as an indication of a lack of aggressiveness to implement corrective action. We agree that it has taken some extended period of time to generate a final product since we made the commitment at Vermont Yankee/USNRC meeting held at Region I Headquarters in July 1987. However, it should be pointed out that several activities were ongoing during that time frame, including the evaluation of other utilities programs, developing a hot particle/skin dose correlation, and assessing Vermont Yankee specific data. These efforts allowed us to establish conversion factors for the RM-14 and the RC-2 to assess potential skin dose problems quickly. Once completed, interim guidance was issued to Radiation Protection Department personnel incorporating all that had been learned. All significant skin contaminations that have occurred during this period were assessed using the practice described above and the Varskin computer code. The dose that was the most conservative was assigned to the exposure record.

The interim guidance has been replaced by plant procedure AP 0520 which was issued on August 4, 1988. This procedure formally establishes the skin dose assessment methodology used at Vermont Yankee. The procedure that addresses additional hot particle administrative controls has been drafted and will be introduced into the review cycle shortly; it is expected that this procedure will be issued before November 1, 1988.

It should be pointed out that we have not had a significant hot particle problem at Vermont Yankee, however, should we get into a situation where a hot particle problem is anticipated prior to finalization of the remaining procedure, we will proactively apply the necessary actions and management controls.

It has always been Vermont Yankee's policy to address issues requiring corrective action in a timely manner with careful consideration of priority and available resources. We recognize that there is always room for improvement and therefore do not take your comments lightly. We have instituted a number of improvements, including procedure improvements, tracking of commitments and development of complete documentation packages to close out commitments. We would be more than happy to review these process changes and other issues identified in the Inspection Report with the NRC inspector during his next visit to the site.

ITEM 3 There is a plant staff over reliance on surveillance procedures to satisfy Technical Specification requirements without recognizing their responsibility to identify and correct procedural inconsistencies.

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Response

The Inspection Report indicated that a number of initiatives have been taken by Vermont Yankee to address this area. Improvements are being made to AP 4000, the Surveillance Program procedure, to provide a clearer link between Technical Specification requirements, the surveillance list and the implementing procedures. Vermont Yankee will perform an independent review of the Technical Specifications and the surveillance list to ensure the list is complete. This review will also verify the existence of an implementing procedure. Additionally, the surveillance list will be computerized, which will allow for stringent control of revisions to the list.

Our program is based on the philosophy that surveillance procedures should be written such that successful completion of the procedure ensures the Technical Specification requirement has been met. The enhancements planned will provide additional assurance that this is the case.

ITEM 4            Inadequate supporting bases for 10 CFR50.59 reviews.

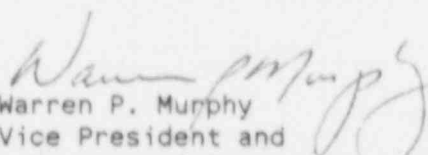
Response

Vermont Yankee has recognized the need to improve written support for 10 CFR 50.59 reviews. Additional training for appropriate personnel has been provided and further training is planned. The need to specifically address the criteria of 10 CFR 50.59 with supporting technical rationale is being emphasized to all those performing safety evaluations. Plant management is giving this area additional attention (including conducting the training) to ensure the desired improvements are achieved. The need to generate a procedure or other guidance documents for performing 10 CFR 50.59 evaluations is being pursued by Vermont Yankee management.

We trust that this information is 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

/dm  
cc: William V. Johnston, Region I  
USNRC Regional Administrator, Region I  
USNRC Resident Inspector, VYNPC