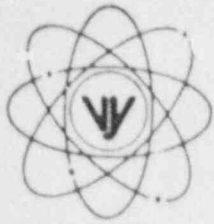


# VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 88-38

REPLY TO:

ENGINEERING OFFICE

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

May 17, 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, NVY 88-056, Inspection Report  
No. 88-03, Notice of Violation, dated 4/1/88  
c) Licensee Event Report 88-01

Dear Sir:

Subject: Response to Inspection Report No. 88-03, Notice of Violation

## Violation

"During a routine NRC inspection conducted on February 9 - March 21, 1988, a violation of NRC requirements was identified. In accordance with the 'General Statement of Policy and Procedure for NRC Enforcement Actions,' 10 CFR Part 2, Appendix C (Enforcement Policy 1986), the violation is listed below.

Technical Specification 3.9.A.1 requires service water (SW) system effluent radiation monitor operability to be in accordance with Table 3.9.1. Table 3.9.1 requires grab samples be obtained and analyzed every 24 hours if the SW effluent radiation monitor is inoperable.

Contrary to the above, from August 22, 1987 to September 3, 1987 the SW effluent radiation monitor was inoperable and the required grab sampling was not accomplished.

This is a Severity Level IV Violation (Supplement 1)."

## Response

### 1. Reasons for Violation

Our investigation of the events revealed that the violation was caused by a component failure and lack of recognition that removal of the circulating water (CW) system from operation would drain the service water system to a point where the service water effluent radiation monitor would not be operable.

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The failure of the flow through the SW effluent radiation monitoring system would normally have been indicated to the operators by the liquid process monitor flow switch causing a downscale indication. The flow switch, as a result of silt build-up within the switch, failed to provide the low flow indication to the operators.

Based on information readily available to the operators, it appeared that the SW effluent radiation monitoring system was working in a normal fashion. The system piping and instrument diagrams do not provide the kind of information that would allow an operator to suspect that by isolating the CW system the SW system would be drained. The failed flow switch did not provide an alarm to indicate that the sampling system was receiving an insufficient flow stream. The logs taken of the instruments indicate that the SW effluent radiation monitoring system was indicating normal levels of radiation within the SW system.

2. Corrective Actions (Immediate and Subsequent)

a. Immediate Actions

Upon determination that the SW effluent radiation monitoring system was inoperative, the grab samples required by Technical Specification Table 3.9.1 were taken. The monitoring system was repaired.

The system was returned to service when the normal valve line-up for the service water and the circulating water system were returned to normal.

b. Subsequent Actions

The service water system procedure was revised to require that the operators check the function of the service water radiation monitor following shifting of the discharge mode.

The control room round sheets were revised to include a once/shift check that the service water radiation monitor readings are in the normal range (i.e., operable) and that there are no alarms present.

Cautionary statements have been added to the SW system procedure to prevent the SW system from being partially drained with the resultant tripping of the sample pump.

Chemistry personnel will continue their weekly check for flow at the monitor.

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Written information was provided to operations shift personnel reiterating the monitoring system operation.

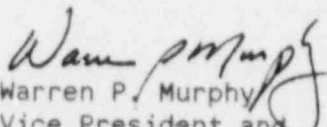
Investigations are being conducted into methods to reduce the potential of silt build-up in the SW effluent radiation monitoring system flow switch.

In summary, we believe that the short-term and subsequent corrective measures fully address the violation.

We trust that the information provided above is acceptable; however, should you have questions or desire additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

  
Warren P. Murphy  
Vice President and  
Manager of Operations

/dm

cc: J.T. Wiggins, Region I  
USNRC Regional Administrator, Region I  
USNRC Resident Inspector, VYNPC