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**Public Service of New Hampshire**

New Hampshire Yankee Division

NYN-87111

September 18, 1987

United States Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Document Control Desk

References: (a) Facility Operating License NPF-56, Docket No. 50-443

(b) USNRC Letter, Dated August 19, 1987, "Inspection Report  
No. 50-443/87-20", William V. Johnston to Robert J. Harrison

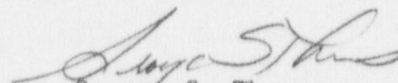
Subject: Response to Inspection Report No. 50-443/87-20

Gentlemen:

In accordance with the requirements of the notice of violation identified  
in Reference (b), enclosed please find our response to that violation.

Should you have any questions concerning our response, please contact  
Mr. Warren J. Hall at (603) 474-9574, extension 4046.

Very truly yours,

  
George S. Thomas

Enclosure

cc: Mr. William T. Russell,  
Regional Administrator  
U.S. Nuclear Regulatory Commission - Region I  
631 Park Avenue  
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Mr. A. C. Cerne  
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NHY RESPONSE TO NOTICE OF VIOLATION

Notice of Violation 87-20-01

As a result of the inspection conducted on July 20-24, 1987, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1986), the following violation was identified:

10 CFR 50, Appendix B, Criterion XIV, requires that measures be established to indicate the operating status of systems and components.

ANSI N18.7-1976, paragraph 5.2.6, "Equipment Control", states in part, "Procedures shall be provided for control of equipment...to avoid unauthorized operation of equipment." Seabrook Station, Maintenance Program Manual, Procedure MA4.2, Revision 5, "Equipment Tagging and Isolation," paragraph 4.2.6, step 1, states "A Danger Tag Hold is used to allow work to be performed on systems or equipment already Danger tagged without issuing a redundant Tagging Order."

Contrary to the above, safety tagging operations were improperly controlled, in that, on July 22 and 23, 1987, two instances were observed where plant maintenance was conducted with applicable Tagging Orders being controlled without a Danger Tag Hold as required by Seabrook Station procedure MA 4.2. In addition, on July 23, 1987, it was observed that Danger Tagged valve 1-SW-V-139 had been physically removed from the Service Water System in violation of the requirements of ANSI N18.7-1976.

Response

The improper implementation of procedure MA 4.2, "Equipment Tagging and Isolation" as cited in Violation 87-20-01 is correct. A subsequent evaluation concluded that the Tagging Order Modifications Section of the subject procedure required better definition and each tagging order should be a stand-alone document.

Immediate Corrective Action

As a result of the above stated violation, the following corrective actions have been taken:

- 1) Tagging Order 87-1395 has been modified to change the boundary isolation from SW-V-139 to SW-V-140 and to release the Danger Tag on SW-V-139. Additionally, Tagging Order 87-1754 has been modified to include all the boundary isolations required to support the removal and reinstallation of SW-V-20.
- 2) An internal audit was conducted on all active Tagging Orders to ensure conformance to MA 4.2. The audit was completed on August 6, 1987, and concluded that the findings were limited to those stated in the violation.

- 3) Equipment tagging procedure MA 4.2 was revised to reflect the following:
  - a) A step was added to Section 4.2.1, Danger Tags, which requires each Tagging Order or Hold Order to be a stand-alone document.
  - b) A step was added to Section 4.2.9, Tagging Order Modifications, which allows modifications to be made to the original Tagging Order if the boundary isolation is to be moved.

This revision was implemented on July 29, 1987.

- 4) The Shift Superintendent, Unit Shift Supervisor and Shift Test Engineers involved with Tagging Orders 87-1395 and 87-1754 have been counseled to ensure each Tagging Order is a stand-alone document.

#### Long Term Corrective Action

Training for all individuals identified on the Switching and Tagging List has been initiated to ensure that the requirements set forth in the equipment tagging procedure, MA 4.2, are understood. It is anticipated that these individuals will complete this training by November 30, 1987.