

APPENDIX A
NOTICE OF DEVIATION

Connecticut Yankee Atomic Power Company
P. O. Box 270
Hartford, Connecticut 06141

Docket No. 50-213
License No. DPR-61

As a result of the inspection conducted on April 13-16, 1987, a deviation was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 2, Appendix C (Enforcement Policy) (1987), the deviation is set forth below:

NRC Generic Letter 82-33 (GL82-33) identified to licensees basic requirements for upgrading their emergency response capabilities. Connecticut Yankee Atomic Power Co., (CYAPCO) responded to one of the basic requirements of GL 82-33, upgrading of their Emergency Operating Procedures, in letters dated April 15, 1983, and September 1, 1983. In these letters Connecticut Yankee Atomic Power Co., (CYAPCO) committed to using an NRC approved Procedures Generation Package (PGP) for upgrading their EOPs. The NRC approved the PGP which included a "Writers Guide" containing detailed instructions for the preparation of the Emergency Operating Procedures.

Contrary to the above, as of April 16, 1987, many of the Emergency Operating Procedures, although technically adequate, did not adhere to the guidelines in the Writers Guide portion of the PGP. Some examples of this deviation are as follows:

1. Contrary to Writers Guide Section 4.2.3, Step 2 of EOP E-1 uses the logic terms "AND" and "OR" within the same step resulting in confusion and the possibility that more than one meaning could be possible.
2. Contrary to the Writers Guide Section 4.2.5, the transition to other steps in EOP E-0 is made using "refer to" and "PER" rather than the recommended term, "GO TO".
3. Contrary to the Writers Guide Section 4.2.4, EOP E-1, page 3 contains a "CAUTION" which should be an action step and EOP ES-3.3, page 4 contains a "NOTE" which should be a "CAUTION".
4. Contrary to Section 2.2, EOP ES1.3, Step 1 which refers to "SIWL Switches", is not consistent with the actual nomenclature in the control room; "Core Cooling Auto-Man A,B".

Further examples are detailed in attached inspection report (50-213/87-10).

This condition has been classified as a Deviation (10 CFR 2, Appendix C) applicable to DPR-61.

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Pursuant to the provisions of 10 CFR 2. Appendix C, paragraph E(2), Connecticut Yankee Atomic Power Company is hereby requested to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further deviations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.