

**ENCLOSURE 1  
NOTICE OF VIOLATION**

Connecticut Yankee Atomic Power Company  
Haddam Neck Plant

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

During an NRC inspection conducted on April 14 - August 13, 1998, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (Enforcement Policy), NUREG 1600, the violations are listed below:

- A. 10 CFR 50.54(q) states, in part, a licensee shall follow and maintain in effect emergency plans which meet the standards in 10 CFR 50.47(b) and the requirements in Appendix E of this part.

The licensee's Emergency Plan, Section 6, and Emergency Plan Implementing Procedures (EPIP) 1.5.-1, Revision 31, Emergency Assessment Using EAL Tables, under Section 6.2 and EAL OU1, Unplanned Release, requires, in part, the declaration of an Unusual Event, for liquid discharges in which total activity exceeds 1000 microcuries.

Contrary to the above, following the unplanned release of about 800 gallons of water containing approximately 2200 microcuries of radioactivity from the "A" waste test tank on June 20, 1998, the licensee failed to declare an Unusual Event.

This is a Severity Level IV violation (Supplement IV).

- B. Technical Specification 6.8.1 requires that written procedures and/or administrative policies be established, implemented and maintained covering the activities as recommended in Appendix A of Regulatory Guide 1.33. Regulatory Guide 1.33 requires that procedures be established governing plant operations and work controls.

1. Procedure NOP 2.14-15B, Revision 4, requires that valve WD-V-133A be closed during the discharge of the "B" Waste test tank (WTT).

Contrary to the above, on June 20, 1998, valve WD-V-133A was open during the discharge from the "B" WTT, resulting in the inadvertent release of 800 gallons of water from the "A" WTT.

2. Work Control Manual (WCM) 2.4-1, Equipment Tagging, Revision 9, requires in Step 1.6.1 that components be aligned and tagged in accordance with the tagging sheet. Procedure NOP 2.0-8, Independent Verification, Revision 0, requires in Step 6.1 that the independent verifier verify that the tagged component is in the correct position.

Contrary to the above: (a) The tagging sheet for Clearance 980200 required that valves SI-928 and SI-929 be red tagged and independently verified closed. On July 14, 1998, valves SI-928 and SI-929 were found open, and, (b) The tagging sheet for Clearance 980229 required that valve PW-V-108A be red tagged and independently verified closed. On July 7, 1998, PW-V-108A was found open. The mispositioning of PW-V-108A resulted in the

inadvertent spray of workers and equipment in the Spent Fuel Building on July 7, 1998.

3. Procedure NOP 2.7-1 requires that valve LD-V-238 be full open to place the reactor coolant system (RCS) letdown post filter in service.

Contrary to the above, on July 27, 1998, LD-V-238 was found less than full open, which caused a partial flow blockage in the letdown line and contributed to the pressure transient and vibrations during the RCS decontamination.

This is a Severity Level IV violation (Supplement IV).

- C. Technical Specifications 3/4.3.3.8 requires that the stack flow monitor be calibrated and operable. Technical Specification Section 1.4 defines the Channel Calibration, which states, in part, "The Channel Calibration shall encompass the entire channel including the sensors and alarm,...."

Contrary to the above, on June 5, 1998, the NRC determined that, since about 1974, a sensor (pitot tube) of the main stack flow rate monitor (FT-1101) was not included for the channel calibration. The stack flow instrument was historically inoperable (LER 98-05).

This is a Severity Level IV violation (Supplement IV).

- D. 10 CFR 50.9(a) requires that the information provided by a licensee to the Commission be complete and accurate in all material respects.

Contrary to the above, on July 20, 1998, the licensee identified an error made in an application to amend License DPR-61. The application made by letter CY 97-006 dated May 30, 1997, stated that following a loss of normal power, limited makeup water to the fuel pool could be provided by gravity feed from a tank. The tank had insufficient inventory to provide gravity feed of makeup water to the fuel pool at the time of the May 30, 1997 application, or any time thereafter, and was abandoned on October 9, 1997.

This is a Severity Level IV violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Connecticut Yankee Atomic Power Company is hereby required to submit a written statement or 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 this 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 or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at King of Prussia, PA  
this 21<sup>st</sup> day of August, 1998