Docket No. 50-29

Yankee Atomic Electric Company
ATTN: Mr. L. H. Heider
Vice President of Operations
1671 Worcester Road
Framingham, Massachusetts 01701

Subject: Inspection 50-29/87-09

Gentlemen:

This refers to your letter dated August 11, 1987, in response to our letter dated July 6, 1987.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Thomas T. Martin, Director Division of Radiation Safety and

Safeguards

cc:
N. N. St. Laurent, Plant Superintendent
J. E. Tribble, President

G. J. Papanic, Jr., Senior Project Engineer - Licensing

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Commonwealth of Massachusetts (2)

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bcc:
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M. Fairtile, LPM, NRR
Robert J. Bores, DRSS

RI:DRSS AW LeQuia/slj
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YANKEE ATOMIC ELECTRIC COMPANY



1671 Worcester Road, Framingham, Massachusetts 01701

August 11, 1987 FYR 87-85

United States Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

References

(a) License No. DPR-3 (Docket No. 50-29)

(b) USNRC letter to Yankee, dated July 6, 1987

Subject:

Response to Inspection No. 50-29/87-09

Dear Sir:

In Reference (b), you requested that Yankee indicate how we will improve the control of high radiation exclusion area keys. Attached is our response, including a commitment to fully implement the new program by September 15, 1987.

If you have any questions or require additional information, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

L. H. Heider

Vice President and Manager

Leider

of Operations

LHH/25.86

Attachment

cc: USNRC Region I

USNRC Resident Inspector, YNPS

8708/8009/2009

ATTACHMENT

The administrative program for the control of High Radiation Exclusion Area (HREA) keys is currently under revision. Upon completion of the revisions, administrative controls of HREA keys will be strengthened due to the following factors:

- 1. All HREA keys in the Control Room key locker under control of the Operations Department will be removed. When required, HREA keys will be issued only at the radiation protection control point in accordance with AP-8009, "High Radiation Exclusion Area Key Control." The HREA key on the primary auxiliary operators key ring is the one exception to this administrative control. Due to operational considerations, it is necessary to provide immediate access to the locked cubicle area controlled by this key. The primary auxiliary operator is on an RWP for this area. Additional controls on this HREA key will be: 1) inclusion on the shift turnover log as a HREA key and 2) separate marking on the key to provide visual identification. If operational considerations in the future require that the Operations Department control any other HREA keys, a separate administrative control program will be developed.
- 2. AP-8010, "Radiation Protection Surveillance of HRA/HREA Controls," requires a weekly inventory of HREA keys by radiation protection supervision. In addition, radiation protection technicians perform a shiftly inventory of HREA keys. In order to ensure that this inventory is both performed and documented in all operational modes, AP-8009, "High Radiation Exclusion Area Key Control," will be revised to require that a HREA key inventory be performed on a shiftly basis and documented in the HREA key control log.
- 3. All duplicate HREA keys have been removed from the key repository.
 HREA's requiring more than one key for entry have been uniquely identified such that the inventory ensures both keys are present on the key ring.
- 4. A list of authorized HREA key issuers is maintained and approved by the Radiation Protection Manager. In order to provide more control, the surveillance frequency of this review will be quarterly instead of annually. In addition, this review has been added to the Radiation Protection Surveillance Tracking Program.

The above actions will provide a strengthened administrative control program for HREA keys. All procedural revisions will be complete and the new program fully implemented by September 15, 1987.