



VERMONT YANKEE NUCLEAR POWER CORPORATION

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FVY 81-72

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REPLY TO:

ENGINEERING OFFICE

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FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-8100

April 24, 1981

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attention: Mr. Boyce H. Grier, Director

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Immediate Action Letter 81-17, dated
April 1, 1981

Dear Sir:

Subject: Response to Immediate Action Letter 81-17

In response to the above referenced letter, Vermont Yankee has completed a review and evaluation of the application of the plant's quality assurance program (10 CFR 50, Appendix B) as applied to the packaging and delivery of radioactive material to a carrier for transport. The results of our evaluation are provided below.

I. Organization

Responsibilities and organizational relationships are established in YOQAP-1-A, Section I, for personnel involved with activities requiring QA. Further controls are provided in the existing plant radwaste packaging procedure.

II. Quality Assurance Program

The responsibility for training of personnel lies with the appropriate plant department. OQA reviews vendor QA programs to assure satisfaction of applicable vendor requirements of Appendix B. Packaging of radioactive materials has been identified as an item requiring Quality Assurance via revisions of YOQAP-1-A, as such, the Quality Assurance implementing procedures are automatically invoked for the procurement and use of casks and liners.

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III. Design Control

The existing plant procurement procedures provide the necessary controls.

IV. Procurement Document Control

The existing plant procurement procedures provide the necessary controls.

V. Instructions, Procedures and Drawings

The plant radwaste packaging procedure has been revised to include the controls necessary to ensure that activities affecting quality are satisfactorily accomplished.

VI. Document Control

Plant and OQAD procedures are controlled in accordance with specified administrative procedures; the existing document control procedures provide the necessary controls.

VII. Control of Purchased Material, Equipment, and Services

The plant radwaste packaging procedure has been revised to incorporate detailed receipt inspection criteria for the casks. The existing plant receipt inspection procedures provide the necessary controls for the liners.

VIII. Identification and Control of Material, Parts and Components

The plant radwaste packaging procedure has been revised to verify the manufacturer's identification number of the cask. The existing plant receipt inspection procedures provide the necessary controls for the liners.

IX. Control of Special Processes

The existing plant procurement procedures provide the necessary controls.

X. Inspection

The plant radwaste packaging procedure has been revised to include inspection, verification, and documentation measures adequate to determine conformance to procedure requirements.

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Periodic inspections of plant activities will be conducted by OQAD to verify compliance with plant procedures, specifically:

1. Receipt of MPR stipulated documentation.
2. Plant submittal of its name/license #, vendor name/license # and package ID# to the NRC prior to initial use of the package.
3. Plant compliance with the applicable terms of the package license.
4. Package is loaded and closed in accordance with plant procedure.

The frequency of the above inspections will be increased and the scope of these inspections will be expanded.

XI. Test Control

The existing plant procurement procedures provide the necessary controls.

XII. Control of Measuring and Test Equipment

The existing plant calibration and test procedures provide the necessary controls.

XIII. Handling, Storage, and Shipping

The existing plant radwaste packaging and storage procedures provide the necessary controls.

XIV. Inspection, Test, and Operating Status

The existing plant radwaste packaging procedure incorporates tracking the status of the cask. The existing plant procedure for identification and control of materials provides the necessary controls for the liners.

XV. Nonconforming, Materials, Parts, or Components

The plant radwaste packaging procedure has been revised to provide a categorization of cask-related discrepancies. Major discrepancies will be documented and corrected in accordance with the existing plant nonconformance procedure.

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The existing plant receipt inspection and nonconformance procedures provide the necessary controls for the liners.

XVI. Corrective Action

The plant radwaste packaging procedure has been revised as described under Section XV. Minor discrepancies of the cask will be documented and corrected in accordance with the existing plant maintenance request procedures.

XVII. Quality Assurance Records

The existing record retention procedures provide the necessary controls. OQAD retains records associated with OQA inspections and audits.

XVIII. Audits

The scope of the annual Health Physics audit, which is performed as part of the In-House Audit Program, will be expanded to provide a more detailed evaluation of the activities pertaining to the packaging and delivery of radioactive material to a carrier for transport in accordance with the requirements of 10 CFR 71.51.

We trust this information is satisfactory; however, should you desire additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

Richard W. Burke for

William F. Conway
Vice President and Manager of Operations

DAR/jh