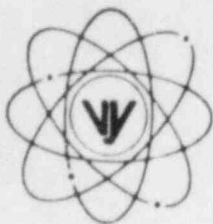


VERMONT YANKEE NUCLEAR POWER CORPORATION



RD 5, Box 169, Ferry Road, Brattleboro, VT 05301

FVY 83-58

2.C.2.11

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD

FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-8100

June 15, 1983

U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs

References:

- a) License No. DPR-28 (Docket No. 50-271)
- b) USNRC Letter to VYNPC, dated April 1, 1983 and
Inspection Report 50-271/82-23
- c) USNRC Letter to VYNPC, dated August 3, 1981
- d) VYNPC Letter to VYNPC, dated May 18, 1981
- e) USNRC Letter to VYNPC, dated April 7, 1981,
Inspection Report 81-03
- f) Memo, WJ Raymond to Inspection Report 82-23 File,
dated April 22, 1983, Extension of Time on Notice
of Violation

Dear Sir:

Subject: Response to I&E Inspection No. 82-23 (Viol. 82-23-05)

This letter is written in response to Reference (b) which indicates that one of our activities was not conducted in full compliance with Nuclear Regulatory requirements. This alleged Level IV violation was identified as a result of a routine inspection conducted by your Mr. W. Raymond during the period November 30, 1982 to January 3, 1983.

Information is submitted as follows in answer to the alleged violation contained in the appendix to your letter.

Item: Title 10 Code of Federal Regulations, Part 50, Section 50.59 states, in part, that the licensee may make changes to the facility as described in the safety analysis report without prior Commission approval, provided that a safety evaluation is performed to verify that the change does not create an unreviewed safety question. Records of the change shall be maintained along with the written safety evaluations which provide the bases for the determination that no unreviewed safety question exists.

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PDR ADDCK 05000271
Q PDR

Contrary to the above, no written safety evaluations were performed or available as of January 3, 1983, for temporary changes made to the main steam isolation valve position indication circuitry under Jumper and Lifted Lead Request Nos. 82-75, 82-81, and 82-84. Modifications completed under the requests changed the facility as described in Final Safety Analysis Report Figures 7.3-12c and 7.3-12d.

Response: Based on the potential violation described in Reference (e) and resolved via Reference (c) and (d), it was in essence agreed that Lifted Lead and Jumper Requests normally utilized for "maintenance activities" or those with no safety significance are installed only long enough to complete the required maintenance. In this case, it is not considered a change to the FSAR and, therefore, no safety evaluation needs to be performed.

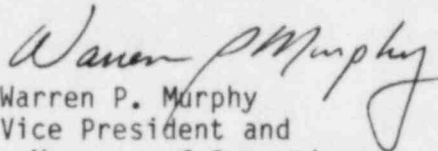
Request Nos. 82-75, 82-81, and 82-84 did, however, change the facility as described in the safety analysis report based on the configuration and no written safety evaluations were performed. It should be noted that the change was made to maintain the main steam isolation valve position indication, and was required because of a DC ground on the limit switch circuitry. The request was implemented to correct an unsatisfactory condition, namely the DC ground. A.P. 0020, Temporary Electrical Jumpers, Lifted Leads, and Mechanical Bypasses, will be revised to require that a written safety evaluation be prepared prior to implementation for any request which renders the facility unlike the description in the FSAR unless the situation is covered by a limiting condition for operation in the facility Technical Specification, classified as "maintenance activity," or does not involve plant safety. It is our intent to have the procedure fully approved and implemented within 60 days from the date of this letter.

In reference to the March 21, event, it should be noted that measures were immediately put into effect which require the originating department head to insure that an independent review is performed on the effects of the Lifted Lead/Jumper Request prior to requesting approval from the Operations Supervisor and the Shift Supervisor. In addition, although Open Item 81-03-01 was never completely resolved with the Commission, Vermont Yankee did revise A.P. 0020 to establish a time frame for Lifted Leads/Jumpers to remain in place and requirements for a Plant Operations Review Committee to eliminate the open-endedness of the procedure.

We trust that this information is satisfactory; however, should you have any questions or desire additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations

WPM/dm