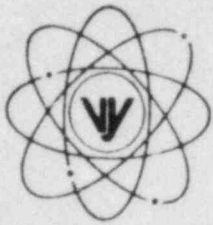


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

2.C.2.1
FVY 83-65

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

June 27, 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 May 26, 1983 and
Inspection Report 83-13

Dear Sir:

Subject: Response to Inspection No. 50-271/83-13 (Violation 83-13-01)

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 V violation was identified as a result of an inspection conducted on May 2 - 5, 1983 by your Mr. J. Wiggins.

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

Item:

"Contrary to the above, during the implementation of EDCR 82-06, a change had been made without the categorization, review and approval required by VYAP 5203* in that: 1) the terminations of cables C1845HRA2 in cabinet 25-56A-A1 and of cable C1844CRB1 in cabinet 25-56B-B2 were not as specified in the design drawings or in the design change installation procedure; and 2) the as-installed condition was neither documented, reviewed nor approved."

* Vermont Yankee Administrative Procedure (VYAP) 6004, Revision 7 (not VYAP 5203 as referenced in the appendix to your letter), Engineering Design Change Requests (EDCR), implements Criteria III and requires that changes which are necessary during the implementation of a design change be categorized as a major or minor and be properly reviewed and approved.

Response:

Vermont Yankee takes exception to the alleged violation as stated in the appendix to the subject inspection report. We contend that, although the wiring configuration at the terminals in question did not agree with the Installation and Test Procedure at the time of the NRC inspection, controls provided by our existing design change close-out procedure would have ensured identification and correction of this discrepancy prior to job close-out. Furthermore, the ability of the affected equipment to perform its designed safety function was verified by satisfactory completion of the system functional test despite the wiring variance, which leads us to conclude that the series of events which contributed to this problem did not pose a significant threat to plant safety and, cumulatively, did not warrant the degree of severity imparted by a violation.

Our investigation of this series of events has revealed the following:

1. The approved design change package (EDCR 82-06) included two wiring drawings correctly showing termination of cables C1845HRA2 at terminal AA 101 in cabinet 25-56A and C1844CRB1 at terminal AA 101 in cabinet 25-56B with a jumper to terminal AA 102 in each cabinet. In addition, a Control Wiring Diagram (CWD) was provided showing the correct termination of cable C1844CRB1, including jumper in cabinet 25-56B. However, the package included another CWD inconsistently depicting termination of cable C1845HRA2 at terminal AA 102 in cabinet 25-56A, with no jumper between AA 101 and AA 102.
2. When the Installation and Test (I&T) Procedure for EDCR 82-06 was developed, the cable terminations were correctly called out in accordance with the approved wiring drawings, but the requirement to install a jumper between terminals AA 101 and AA 102 was inadvertently omitted from the procedure.
3. Post-installation inspections performed, independently, by contractor and licensee quality assurance personnel showed the cable terminations to be in agreement with the approved I&T procedure. These inspections are performed to verify that the installed equipment is ready to be released for functional testing.
4. During post-installation functional testing in accordance with an approved test procedure, technicians found that the cabinets would not energize. Troubleshooting of the problem in cabinet 25-56A was undertaken using the approved CWD, which is consistent with normal practice. Since the wiring in cabinet 25-56B was identical, the technicians did not closely scrutinize the CWD for that cabinet. Upon discovering that no electrical conductor existed between AA 101 and AA 102, the technicians changed the wiring configuration in both cabinets

to agree with the CWD for cabinet 25-56A by terminating each cable at AA 102. The technicians believed that they had discovered and corrected a wiring error and that no changes to the design and installation documents were necessary. The cabinets then energized and tested satisfactorily.

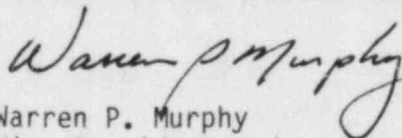
The technicians had no cause to suspect that the CWD for cabinet 25-56A was inconsistent since it had been reviewed and approved prior to inclusion in the EDCR package; also, the installation portion of the I&T Procedure (which was an independent document) had been filed upon completion and was not readily available for comparison.

It should be emphasized that the installed wiring configuration, while not completely in agreement with the approved drawings and I&T Procedure, was proven to be electrically equivalent and operationally adequate. Therefore, this situation had no impact on plant safety. We are confident that the discrepancy between the wiring drawings and the CWD would have been discovered during development of "as-built" drawings prior to job close-out, which would have lead to further investigation and corrective action. In addition, we take exception to an opinion documented within the inspection report that "these discrepancies were indicative of a weakness in the licensee's control over design change implementation and plant configuration control." Following our evaluation of the events detailed above, we conclude that this is an isolated incident without generic implication and that it is not indicative of a general weakness in our system. Consequently, we request that the alleged violation be withdrawn.

We trust that this information will be satisfactory. If you have any further questions or need additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Warren P. Murphy
Vice President and
Manager of Operations