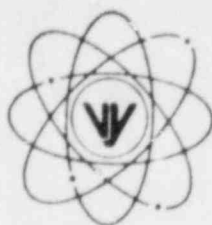


VERMONT YANKEE
NUCLEAR POWER CORPORATION



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

2.C.2.11
FVY 82-118

REPLY TO:
ENGINEERING OFFICE

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

November 12, 1982

U.S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
Washington, D.C. 20555

Attention: Mr. Richard C. DeYoung, Director

References:

- a) License No. DPR-28 (Docket No. 50-271)
- b) USNRC Letter to VYNPC, dated October 15, 1982 and attached Notice of Violation and Proposed Imposition of Civil Penalties, EA 82-112
- c) USNRC Letter to VYNPC, dated July 22, 1982 and attached Emergency Preparedness Appraisal 50-271/82-05
- d) VYNPC Letter to USNRC, dated September 8, 1982
- e) USNRC Letter to VYNPC, dated July 21, 1982 and attached Investigation Report 82-12
- f) USNRC Letter to VYNPC, dated May 12, 1982 and attached Inspection Report 82-07
- g) USNRC Letter to VYNPC, dated September 1, 1982

Dear Sir:

Subject: Response to Notice of Violation and Proposed Imposition of Civil Penalties, EA 82-112

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 Commission requirements. This alleged Level III violation was identified as a result of special investigations conducted by USNRC representatives following a loss of feedwater transient on April 24, 1982, as documented in References (e) and (f).

Attachment 1 of this letter details our response to the specifics of the Notice of Violation.

We acknowledge the facts as outlined in Mr. Ronald Haynes' letter of October 15, 1982 (Reference (b)), concerning the NRC inspection conducted at Vermont Yankee on April 26-30; the special NRC investigation conducted on June 6-9; the meeting held in Montpelier, Vermont, on July 9, attended by Vermont State officials, NRC I&E Region I management, and Vermont Yankee management; and the Enforcement Conference held in Region 1 headquarters on August 24.

DCS

• BILL FOR COLLECTION

Bill No. _____

U.S. Nuclear Regulatory Commission

Date November 22, 82

(Department or Establishment and Bureau or Office)

Washington, DC 20555

(Address)

PAYER:

Vermont Yankee Nuclear Power Corporation
RD 5, Box 169 Ferry Road
Brattleboro, VT 05301

*This bill should be returned by the
payer with his remittance.*

SEE INSTRUCTIONS BELOW.

Date	DESCRIPTION	Quantity	Unit Price		Amount	
			Cost	Per		
11/22/82	Received full payment for CP dated 10/15/82 for Docket No. 50-271, EA 82-112.				\$40,000.00	
AMOUNT DUE THIS BILL.					\$40,000.00	

This is not a receipt

INSTRUCTIONS

Tender of payment of the above bill may be made in cash, United States postal money order, express money order, bank draft, or check, to the office indicated. Such tender, when in any other form than cash, should be drawn to the order of the Department or Establishment and Bureau or Office indicated above.

Receipts will be issued in all cases where "cash" is received, and only upon request when remittance is in any other form. If tender of payment of this bill is other than cash or United States postal money order, the receipt shall not become an acquittance until such tender has been cleared and the amount received by the Department or Establishment and Bureau or Office indicated above.

Failure to receive a receipt for a cash payment should be promptly reported by the payer to the chief administrative officer of the bureau or agency mentioned above.

IE-14

VERMONT YANKEE
NUCLEAR POWER CORPORATION

NO 3837

RAYMOND

「兵衛三郎」

MOORE

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ANTHONY J. BOND, JR. and JAMES W. BOND

7-5806-2

VERMONT YANKEE NUCLEAR POWER CORPORATION

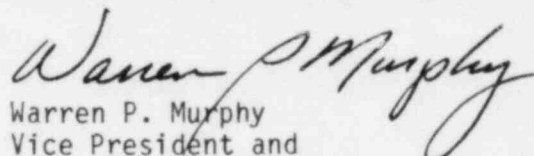
U.S. Nuclear Regulatory Commission
November 12, 1982
Page 2

At both of the meetings we responded openly and candidly to the questions and concerns of both NRC and State of Vermont officials. As we explained at the Enforcement Conference, we immediately conducted our own investigation of the event of April 24 and, as an additional measure to ensure complete objectivity, we employed the services of a reputable consultant team experienced in nuclear power operations and management to review the event of April 24 and related events.

As a result of these efforts, we came to the same conclusion as that reached by NRC Region I management, namely, that the event of April 24 did not involve willful or careless disregard for requirements on the part of plant personnel nor was the public health and safety adversely affected. Despite these findings, however, be assured that Vermont Yankee Nuclear Power Corporation fully recognizes the significance of the events resulting from the loss of feedwater transient of April 24, and that we have taken the necessary action to ensure that such events do not recur in the future.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Warren P. Murphy
Vice President and
Manager of Operations

WPM/dm

cc: Mr. Ronald C. Haynes, Regional Administrator
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, PA 19406

ATTACHMENT 1

Answer to Notice of Violation and Proposed Imposition of Civil Penalties Dated October 15, 1982

A. Admission or Denial of the Alleged Violation

While we believe that the Shift Supervisor's immediate response to this event was appropriate in that he endeavored to analyze, at first hand, a priority item of concern (loss of feedwater and resultant decline in reactor water level), we agree that he did not subsequently re-establish a suitably broad perspective of operational conditions. Likewise, we acknowledge that the Nuclear Safety Engineer (NSE) failed to properly communicate to the operators his observations during, and subsequent to, the event.

It should be emphasized, however, that the plant was in a safe status at that point in time and the apparent deficiencies in overall cognizance did not compromise plant safety.

Reasons for the Violation

The Shift Supervisor's failure to maintain an adequate awareness of changes in system status is attributed in part to insufficient training in the managerial aspects of his supervisory function. Contributing factors of a circumstantial nature are detailed in References (e) and (f), and need not be reiterated here. At the time of the initial NRC notification the Shift Supervisor believed that he had correctly assessed the sequence of events based on his first-hand involvement.

The NSE's failure to properly advise the Shift Supervisor resulted from his reluctance to interfere with the operating crew during the early stages of the transient. Subsequent operator actions led him to believe that the operating crew had become aware of the ECCS initiation. A detailed description of the NSE's involvement is provided in Reference (e).

Corrective Steps Taken

Following this event, all Shift Supervisors were reinstructed in the applicable requirements of plant procedure AP 0150, Responsibilities and Authorities of Operations Department Personnel, and were required to review NRC Inspection Report No. 82-07 and Plant Information Report 82-05. Furthermore, the 1982 licensed operator requalification program included additional emphasis on proper recognition of Control Room indicators generated by the automatic actions experienced during this event.

To ensure that NSEs fully understand their role as part of the shift operating crew, we have instituted a program during 1982 which requires those attending simulator training to undergo specific instruction and practical exercise in the Shift Technical Advisor function. At the time of this event, the NSE in question had not yet received the enhanced simulator training; he ultimately completed this training.

On April 27, 1982, the Manager of Operations communicated to the Shift Supervisors and NSEs his concern regarding the proper implementation of their managerial and advisory responsibilities.

Corrective Steps to be Taken

To assist Shift Supervisors in developing appropriate managerial skills, a management training program is being prepared and will be administered to all current Shift Supervisors and candidates for the Shift Supervisor position. Until the new program is in place, these personnel will be integrated, as available, into the management training program presently established for NSEs. In any event, management training will be provided to every newly appointed Shift Supervisor, Senior Control Room Operator or NSE prior to his being assigned to a shift.

The 1983 licensed operator requalification program will feature increased attention to recognition of applicable Control Room indications and the use of multiple indications in obtaining an adequate awareness of overall plant status. We will also consider the use of demonstrative examinations to gain experience in the emergency event classification procedure.

As a result of our internal evaluation of this event, we are assessing the need for specific physical changes to the plant (e.g., feedpump trip setpoint, feedpump trip annunciation, etc.) which could aid control room operators in correctly evaluating and responding to off-normal conditions. This assessment will be completed by December 31, 1982, with design work commencing soon thereafter.

To facilitate the integration of NSEs with the shift operating crew, we are considering changes to the NSE program. Under consideration are steps to transfer NSE organizational responsibility to the Operations Department, place NSEs under the direct control and supervision of the Shift Supervisor, and adjust the NSE duty schedule to agree with the operating shift schedule. Any resulting modifications to the Technical Specifications will be proposed to the Commission by December 31, 1982.

We have evaluated the NRC's recommendation regarding the need to provide additional training for plant personnel in transient analysis and have concluded that our current program for instruction of operators and NSEs in transient recognition and response is adequate. Note that no commitment was made at the Enforcement Conference of August 24, 1982 to modify this program and nothing in our evaluation, or yours, points to such a need.

The above corrective actions will be completed in the timeframes discussed within the above responses.

B. Admission or Denial of the Alleged Violation

We agree that Control Room personnel failed to recognize and promptly classify this event in accordance with the requirements of the Vermont Yankee Emergency Plan.

Reasons for the Violation

This failure resulted from an inadequacy in the implementing procedure for emergency event classification. The procedure contained information which was not in agreement with the Emergency Plan.

Corrective Steps Taken

Following the event, all licensed operating personnel were instructed in the proper classification for a feedwater transient/ECCS injection event. Subsequently, the Emergency Plan was upgraded and the procedure was clarified to agree with the new plan. The revised procedure was issued in September 1982 and additional detailed training on both the plan and the procedure was provided to all senior licensed personnel and Nuclear Safety Engineers.

Corrective Steps to be Taken and Compliance Date

Overall Emergency Plan training, as well as many other areas of our emergency preparedness program, is being upgraded as detailed in Reference (d), which provided our response to your appraisal of March 16-24, 1982 (Reference (c)).

Enclosed is a check for \$40 00 as required by the Notice of Violation and Proposed Imposition of Civil Penalties.