



# VERMONT YANKEE NUCLEAR POWER CORPORATION

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RUTLAND, VERMONT 05701

2.C.2.11  
FVY 81-136

REPLY TO:

ENGINEERING OFFICE

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

September 15, 1981

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

Attention: Eldon J. Brunner, Chief  
Reactor Projects Branch #1  
Division of Resident and  
Project Inspection

References: (a) License No. DPR-28 (Docket No. 50-271)  
(b) USNRC Letter to VYNPC, dated August 12, 1981,  
and Inspection Report 50-271/81-08

Dear Sir:

Subject: Response to I&E Inspection No. 81-08

This letter is written in response to Reference (b) which indicates that certain of our activities were not conducted in full compliance with Nuclear Regulatory Commission requirements. These alleged items of non-compliance were identified during the inspection performed by your Mr. W. Raymond to investigate results of the Performance Appraisal Branch inspection (April 1-May 15, 1981) which were turned over to the Resident Inspector as potential enforcement findings.

Information is submitted as follows in answer to the alleged items of noncompliance contained in the appendix to your letter.

Item (INC 81-08-02):

Technical Specification 6.5.A requires that written procedures involving nuclear safety be prepared and followed. Administrative Procedure AP 0020, Lifted Lead/Installed Jumper Requests, was prepared pursuant to Technical Specification 6.5.A and establishes controls to be exercised over jumpers and lifted leads, including requirements for the Shift Supervisor to authorize implementation of the requests and requirements regarding information to be documented on the requests.

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Contrary to the above, examples of failure to meet the AP 0020 requirements were identified during inspection reviews of the following Jumper/Lifted Lead Requests (J/LL).

- Changes were made to the control circuitry of the refueling bridge Frame Mounted Hoist on October 21, 1980, under J/LL Request No. 81-0083 without Shift Supervisor approval to implement the request.
- Signal leads for annunciator window D-7 Alarm Panel 8-A were lifted on May 20, 1980, under J/LL Request No. 80-0035. As of April 1, 1981, Section I of the request form was not filled in to indicate that the work had been done and verified to be satisfactorily completed.
- Annunciator window A-1 of Panel A-1 was temporarily disabled on April 28, 1981, under J/LL Request No. 81-0017 and subsequently returned to service. As of May 5, 1981, Section K of the CLOSED request form was not filled in to show either what testing was completed or explain why retesting was not required upon restoration of the alarm.

Response: The subject Lifted Lead/Installed Jumper Requests have been researched and appropriate entries have been completed. Administrative Procedure AP 0020 will be evaluated for adequacy and clarified as necessary. Applicable personnel will be reinstructed in its use prior to the 1981 Refueling Outage.

Item (DEV 81-08-03):

NUREG 0737, dated October 31, 1980, Item I.A.2.1, includes the NRC position, promulgated by the NRC (Denton) letter of March 28, 1980, which establishes revised pass-fail criteria to be applied to the Requalification Program annual evaluation exam for determining whether a licensed operator requires accelerated retraining prior to resumption of licensed duties. Implementation of the revised criteria became effective with the next annual requalification exam administered after March 28, 1980. Vermont Yankee letter WY 80-170, dated December 15, 1980, stated that Vermont Yankee is in compliance with the Upgraded RO and SRO Training and Qualification requirements of Item I.A.2.1.

Contrary to the above, scores attained on an annual evaluation exam administered on February 9, 1981, were less than the revised pass-fail criteria and, as of May 6, 1981, the licensed individual had not been provided retraining prior to resumption of licensed duties.

We note that actions were taken on May 6, 1981, in accordance with NUREG 0737, Item I.A.2.1

Response: Corrective actions that have been taken are documented in Inspection Report 81-08. This problem will not be repeated because the new 80%-70% grading criteria have been incorporated into training procedures AP 0710 and AP 0711 issued July 24, 1981, which reflect present NRC requirements with regard to training.

Item (INC 81-08-06):

Technical Specification 6.5.A requires that written procedures involving nuclear safety be prepared and followed. Administrative Procedure AP 0021, Maintenance Requests (MR), was prepared pursuant to Technical Specification 6.5.A and establishes controls to be exercised over safety related plant equipment when removal from/returned to service for maintenance. Steps 8 and 9 of AP 0021 require that the original (white) copy of the MR form be forwarded to the Control Room as soon as possible upon completion of repairs to facilitate operational testing and proper documentation.

Contrary to the above, examples of failure to meet the AP 0021 requirements were identified during inspection reviews of the following MR's:

- Safety related MR 80-1200 was issued on November 13, 1980, to replace mechanical seals on three RHR pumps. Work under the MR and operational retesting was completed by December 7, 1980. As of April 11, 1981, Section IV of MR-1200 had not been completed by the Shift Supervisor to document that the specified operational testing had been satisfactorily completed.
- Safety related MR 81-009 was issued on January 2, 1981, to repair RWCU system valve VI2-18. Work under the MR and operational testing was completed on January 2, 1981, but Section IV of MR 81-009 was not completed until January 27, 1981, to show satisfactory completion of operational testing.
- Safety related MR 80-1080 was issued on October 2, 1980, to repair a drywell sample inboard isolation valve. Work under MR 80-1080 and operational testing were completed by December 10, 1980, but Section IV of the MR was not completed until April 2, 1981, to document satisfactory completion of operational testing.

Response: The present intent of the procedure is that the applicable surveillance documentation associated with the Maintenance Request shows that the required post-repair retests were satisfactorily performed prior to return of the affected equipment to service. Such documentation did indeed exist for the three Maintenance Requests noted above. However, our investigation of the alleged item of noncompliance has identified an administrative problem in transcribing the documentation of the retest on the Maintenance Request forms.

As a result of this evaluation, Administrative Procedure AP 0021 will be revised prior to January 1, 1982, to state that post-repair retesting of safety-related systems and components will be performed in accordance with the applicable surveillance testing procedure and documentation of satisfactory completion will be accomplished in accordance with that procedure. Since surveillance testing procedures require notification of the Shift Supervisor upon completion of testing, adequate verification of successful retest prior to return of equipment to service will be ensured. The Maintenance Request will no longer serve as a duplicate verification of the satisfactory retest of safety-related equipment.

Item (INC 81-08-08):

10 CFR 50, Appendix B, Criterion XVIII requires that a comprehensive system of planned and periodic audits be carried out in accordance with written procedures or checklists to verify compliance with all aspects of the quality assurance program. Criterion V of 10 CFR 50, Appendix B requires that activities affecting quality be prescribed by documented instructions or checklists that include appropriate acceptance criteria for determining that the activities have been satisfactorily completed. Yankee Atomic Topical Report YOQAP-1-A defines and establishes a Quality Assurance Program to meet the requirements of 10 CFR 50, Appendix B. YOQAP-1-A section XVIII establishes the requirements for the conduct of audits, including audits characterized as random informal surveillance of plant activities, to be performed in accordance with implementing documents. YOQAP-1-A Section V.B requires that procedures include appropriate qualitative or quantitative acceptance criteria for determining that activities have been satisfactorily accomplished.

Contrary to the above, as of May 1, 1981, the Operational Quality Assurance Department did not provide procedures or written instructions with appropriate quantitative or qualitative acceptance criteria for the conduct of random informal surveillance of plant activities.

Response:

We agree with several of the positive determinations made by the inspector in regard to the above subject which bear repeating herein.

1. No written procedure/instruction existed for the informal audits and none were intended due to the random and informal nature of the audit activity.
2. The random, informal audits of plant activities are conducted by the on-site OQA Coordinator and are in addition to the formal In-Plant Audit Program.

3. The licensee's intent is to give the on-site OQAC the freedom and flexibility to monitor plant activities in progress in the course of normal work routines, and to rely on auditor experience and judgement to determine the adequacy of observed plant activities in progress.
4. Plant maintenance or I&C work in progress and the status of conditions of operating equipment as observed during a plant tour are examples of plant activities covered by the informal audit program.
5. Discrepancies observed during the course of the informal surveillance are usually discussed at the supervisory level to obtain resolution of concerns and a log of the surveillance activity is maintained by the OQAC.

We strongly disagree, however, that failure to formally establish instructions for the informal surveillances, along with appropriate acceptance criteria, is contrary to the requirements of 10 CFR 50, Appendix B, Criterion V, YOQAP-I-A Section V.B and YOQAP-I-A Section XVIII.C. We believe that our commitment to perform informal surveillance of plant activities goes beyond the requirements of 10 CFR 50, Appendix B, and that to formalize our informal surveillance of plant activities would be inflexible and mechanistic, and would destroy its effectiveness.

We shall, therefore, revise YOQAP-I-A on or before January 1, 1982, to delete the written commitment to perform random, informal surveillance of plant activities.

We will continue to observe and report any discrepancies found during our formal plant activities, for corrective action.

Item (INC 81-08-09):

10 CFR, Appendix B, Criterion II requires that a Quality Assurance Program be established which complies with the requirements of Appendix B to provide controls over activities affecting the quality of specified structures, systems, and components. YOQAP-I-A established a Quality Assurance Program to meet the requirements of Appendix B, 10 CFR 50 and states in Section II.C that establishment of an effective Operational Quality Assurance Program is assured through nonconformance with specified ANSI Standards, including ANSI N45.2-1 '72 - Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants. ANSI N45.2.2 requires in Section 2.7 that items shall not be classified according to the requirements of one quality level and then packaged, shipped, received, stored or handled according to a level of lower grade. Vermont Yankee Procedure AP 0803, Storage of Materials and Equipment, establishes controls in accordance with YOQAP-I-A and ANSI N45.2.2.

*Diane M. McCue*  
Diane M. McCue Notary Public  
My Commission Expires February 10, 1983