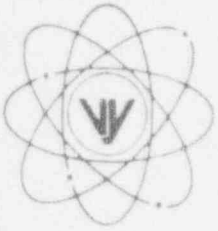


VERMONT YANKEE NUCLEAR POWER CORPORATION



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REPLY TO
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(508) 779-6711

September 2, 1994
BVY 94-89

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, USNRC to VYNPC, Inspection Report No. 50-271/94-13, dated 8/4/94

Subject: Reply to a Notice of Violation - Inspection Report No. 50-271/94-13

This letter is written in response to Reference (b), which documents that our activities were not conducted in full compliance with NRC requirements. The Violation, classified as a Severity Level IV, was identified during a routine inspection conducted from May 15 to June 25, 1994. Our response to this violation is provided below.

VIOLATION:

Technical Specification 6.2.A.6 requires that the Plant Operations Review Committee (PORC) review plant operations to detect any potential safety hazards.

Contrary to the above, on certain occasions the PORC failed to review plant operations to detect safety hazards, as evidenced by the following examples:

1. On April 6, 1994 the PORC reviewed a safety significant condition involving reactor coolant system leakage (RCS) into the "A" core spray (CS) subsystem, which had existed since the October 25, 1993 plant start-up from Refueling Outage XVII. This review included an assessment of operability for the subsystem and corrective actions that

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relied upon an existing alarm response procedure. The PORC review failed to detect that implementation of this procedure would result in three operational safety issues involving the loss of a low pressure piping high pressure alarm; the acceptability of the pressure rating and quality of a pressure switch required to retain RCS pressure; and marginal differential pressure opening capabilities of closed CS injection valves required to automatically open in response to accident conditions. This latter issue resulted in the "A" CS subsystem being inoperable for 81-hours following the implementation of the alarm response procedure.

2. On February 10, 1994, plant operators, in response to a loss of the vital fire suppression water supply system, cross-connected this fire water system to the service water system. The PORC did not review this plant operating condition for the purposes of detecting potential safety hazards. Subsequently, it was determined that the cross-connection of the systems resulted in the inability to provide needed service water to important safety-related equipment during accident conditions.

In the aggregate, this is a Severity Level IV violation.

RESPONSE:

- (1) Reason for the Violation:

The cause of the violation was that our standards and expectations for safety reviews were not sufficient to consistently ensure comprehensive assessments of the safety significance of plant events and conditions. This occurred at both the preparation level and at the PORC review level. Our PORC evaluation process has relied heavily upon the quality of the safety review presentations and has not consistently challenged the assumptions and conclusions of the presentations. Contributing to this violation was the limited guidance and training for our staff, and PORC committee members who assess the safety reviews.

- (2) Corrective steps that have been taken and the results achieved:

Immediate corrective action undertaken by the Plant Manager was to meet with the PORC members to review this violation and identify ways to improve the detail and depth of safety reviews. Suggestions for improvements were solicited

and several, such as providing relevant information to PORC members prior to the meeting and requiring more comprehensive presentations to PORC, have already been implemented. Additionally, a clear statement of the expectations for appropriate reviews and responsibilities of both PORC members and personnel presenting material to PORC has been reviewed at recent Plant Manager meetings, PORC meetings and in a memorandum to the staff. More detailed presentations including, demonstrations, copies of appropriate drawings, FSAR sections, and Technical Specification sections are now required. These initiatives have had an immediate, positive effect on the quality and overall depth of PORC safety reviews.

(3) Corrective steps that will be taken to avoid further violations:

We will pursue additional enhancements to our safety review process through a benchmarking effort of other facilities. We recognize that the review process begins with the preparation of the safety assessment and are already considering enhanced training and formal clarification of expectations for both preparers and reviewers of safety assessments. We will utilize the information obtained from the benchmarking effort to assist in the development of a formal plan to ensure we maintain high standards and levels of consistence in our safety review process. The plan will, at a minimum, address training, staffing and a more effective review process.

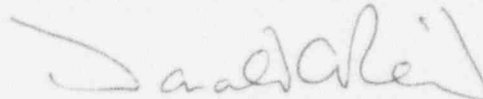
(4) Date when full compliance will be achieved:

This plan and its implementation is expected to be completed by December, 1994.

We trust that the information provided is responsive to your concerns; however, should you have any questions or require any additional information, please do not hesitate to contact us.

Sincerely,

VT YANKEE NUCLEAR POWER CORP.



Donald A. Reid
Vice President, Operations

cc: USNRC Region 1 Administrator
USNRC Resident Inspector - VYNPS
USNRC Project Manager - VYNPS