

VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 82-127

2.C.2.11

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD

FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-8100

December 3, 1982

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

Attention: Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) USNRC Letter to VYNPC, dated October 23, 1982 and
Inspection No. 50-271/82-13

Dear Sir:

Subject: Response to Inspection No. 50-271/82-13

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. The alleged Level V violation was identified as a result of a routine investigation conducted by your Mr. D.J. Collins during the period June 23-25, 1982.

Information is submitted as follows in answer to the alleged violation contained in the Appendix to your letter:

Item:

10 CFR 71.62(c) requires the licensee to maintain Quality Assurance records during the life of the package, of monitoring, inspection, and auditing of work performance during maintenance and repair of the packaging.

Contrary to the above, as of June 25, 1982, the licensee had not maintained Quality Assurance records of monitoring, inspection, and auditing of work performance during maintenance and repair of shipping packages.

Response:

The maintenance and repair activities identified in the Notice of Violation are performed by Hittman Nuclear and Development Corporation, owner of the shipping casks, under License No. 19-17039-01. Hittman supplies radwaste transportation services under contract to Vermont Yankee, and has primary responsibility for design, manufacture, testing and maintenance of the

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casks. The quality assurance records required by 10 CFR 71.62(c) for activities performed at the Hittman facility are maintained by Hittman in accordance with an NRC-accepted quality assurance program. This program has been audited by Vermont Yankee's quality assurance representative and found to be acceptable.

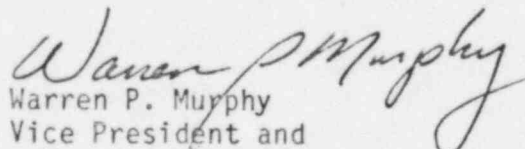
Certain maintenance and repair activities may be performed by Vermont Yankee as a result of inspections conducted prior to cask use. However, these activities are governed by the general license provided by 10 CFR 71.12 for delivery of licensed material to a carrier for transport. Under this license, Vermont Yankee is required to maintain: (1) the quality assurance records generated in accordance with our NRC-approved quality assurance program (which satisfies the provisions of 10 CFR 71.51); (2) a copy of Hittman's certificates of compliance for the applicable shipping packages; and (3) a copy of all documents referred to in the certificates of compliance.

Since Hittman Nuclear and Development Corporation, as the cask owner and licensee, is responsible under 10 CFR 71.62(c) for "monitoring, inspection and auditing of work performance during the design, fabrication, assembly, testing, modification, maintenance and repair of the packaging," Hittman is also responsible for retention of the quality assurance records associated with these activities. Therefore, we believe that the requirements of 10 CFR 71.62(c) have been properly implemented, and we take exception to the alleged violation.

We trust this information is satisfactory. If you need additional information, please feel free to contact us.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations

WPM/dm