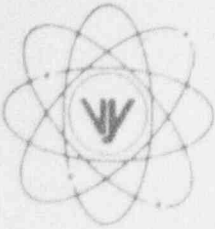


# VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO:  
ENGINEERING OFFICE  
580 MAIN STREET  
BOLTON, MA 01740  
(508) 779-6711

November 15, 1994  
BVY 94-114

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. 50-271/94-20, dated 10/18/94

Subject: Reply to a Notice of Violation - Inspection Report No. 50-271/94-20

This letter is written in response to Reference (b), which documents that our activities were not conducted in full compliance with NRC requirements. A Violation, classified as a Severity Level IV, was identified during a routine inspection conducted from August 7 to September 17, 1994. Our response to this Violation is provided below.

## VIOLATION:

Vermont Yankee Technical Specification 6.5 requires that procedures involving safety shall be adhered to. Plant Administrative procedure AP-0894, Revision 3, "Shift Staffing/Overtime Limits," was written pursuant to Technical Specification 6.5 to administratively control the use of overtime for persons performing safety-related functions. Procedure AP-0894 requires, in part, that overtime in excess of 16 hours in a 24-hour period shall be approved by the Plant Manager or Operations Superintendent prior to the occurrence.

Contrary to the above, on September 3, 1994, a Reactor & Computer Engineer performing safety-related surveillance of core thermal power limits worked 18 hours in a 24-hour period without approval of the Plant Manager or Operations Superintendent.

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This instance constitutes a Severity Level IV violation.

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RESPONSE:

Reason for the Violation:

Vermont Yankee agrees with the stated Violation concerning overtime limits. The cause of the Violation was a failure to reinforce management expectations for overtime as delineated in plant procedure AP-0894, when an engineer remained past his regularly scheduled shift in order to complete a surveillance. It was recognized by Plant Management that overtime hours would have to be carefully administered during the associated plant start-up due to the resources required to (a) perform single-rod scram testing while in single recirculation loop operation; (b) return to two recirculation loop operation and (3) return to full power operations.

Corrective steps that have been taken and the results achieved:

Immediate corrective action taken by the Reactor & Computer Engineering Manager was to relieve the engineer from further duty. All work performed by this individual was verified for accuracy. No performance concerns were identified. All Reactor & Computer Engineering personnel were reinstructed on the overtime requirements of AP-0894 and the importance of complying with them. Additionally, the need for compliance with the overtime requirements of AP-0894 has been reinforced at a number of Plant Manager meetings for the benefit of all managers.

Corrective steps that will be taken to avoid further Violations:

Although this incident is believed to be an isolated event, a self-assessment of our overtime controls will be performed. This effort will encompass soliciting benchmark information from other utilities, and developing an action plan that improves our overtime administration for all staff including engineers, supervisors and managers. The self-assessment will be complete by January 1995 and any additional corrective actions implemented prior to our 1995 Refueling Outage.

Date when full compliance will be achieved:

Vermont Yankee is currently in full compliance with the overtime and shift staffing requirements of AP-0894.

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,

VERMONTYANKEE NUCLEAR POWER CORP.

A handwritten signature in dark ink, appearing to read "Donald A. Reid". The signature is fluid and cursive, with the first name "Donald" and last name "Reid" clearly distinguishable.

Donald A. Reid  
Vice President, Operations

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