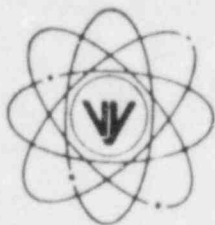


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

2.C.2.11
FVY 83-114

REPLY TO:

ENGINEERING OFFICE

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

October 26, 1983

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) Letter, USNRC to VYNPC, dated 9/30/83, and
Inspection Report No. 83-22, Appendix A
(Notice of Violation)

Dear Sir:

Subject: Response to Inspection Report 83-22

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. The alleged Level IV violations were identified as a result of an inspection conducted by your Mr. E. Shaub during the period July 11-15 and 18-20, 1983.

Information is submitted as follows in answer to the alleged violations contained in the Appendix to your letter.

- A. 10 CFR 50, Appendix B, Criterion X; the NRC approved Yankee Atomic Electric Company Operational Quality Assurance Topical Report (YOQAP-1-A); and ANSI N18.7-1976, Administrative Controls and Quality Assurance for the operational Phase of Nuclear Power Plants, require the following:
- o inspections, including examinations, measurements, or tests for each operation where necessary to assure quality;

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- o inspection by other than those directly responsible for doing or supervising the work; and
- o establishment and implementation of procedures providing guidelines to determine the need for inspections, requirements and acceptance limits, and inspection responsibilities.

Contrary to the above, inspections of more important maintenance activities were not performed routinely; independence of inspection personnel was not maintained or determinable; and, implementing procedures did not provide sufficient guidance regarding accomplishment of inspections. The following examples are provided:

- o Of approximately 75 Maintenance Requests (MR's) sampled for work that was accomplished between January 1, 1983 and June 1, 1983, only two MR's indicated inspection by QA/QC and only two other MR's indicated independent inspection of the work perform (MR's 83-0257, 0816, 0115, and 0162 respectively).
- o The inspections accomplished on MR's 83-0921 and 1068 were performed by the responsible first line supervisors during the 1983 outage.
- o Procedure AP 0021 did not provide sufficient guidance to personnel for determining the need, requirements, acceptance criteria, and responsibilities for inspections which resulted in inadequate inspection effort and confusion among personnel since workers also signed as the inspectors on MR's 83-0027 and 0487.

Response: Vermont Yankee recognizes that a problem exists in the documentation of required information and the requirement to perform a meaningful number of independent inspections regarding Maintenance Requests. Retraining of all Operators, Engineering Support, Maintenance and I&C department personnel in the proper implementation of AP 0021, Maintenance Requests, Rev. 11, is currently in progress and will be completed no later than December 15, 1983. We feel this effort will resolve most of the problem areas described in the referenced violations. However, further improvements to our maintenance procedure are currently being evaluated per a recent INPO evaluation and in conjunction with the Salem ATWS event generic concerns. This evaluation and subsequent revision to AP 0021 will be accomplished by May 1, 1984. This action will rectify all potential deficiencies which have been identified in the aforementioned documents as well as the identified problems in the referenced violations.

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- B. 10 CFR 50, Appendix B, Criterion II, Quality Assurance Program, requires that the QA Program be established, documented by written policies, procedures or instructions to provide control over activities affecting the quality of items consistent with their importance to safety; and that these written controls be carried out throughout plant life. The NRC approved Yankee Atomic Electric Company Operational Quality Assurance Topical Report (YQQAP-1-A), Rev. 11, requires that the Yankee Atomic Electric Company (YAEC) Nuclear Services Division Quality Assurance Department (OQA) conduct QA surveillance of plant activities including instructions, procedures, and drawings; purchased material and equipment; inspection; test control; inspection, test and operating status of items; and, nonconforming items.

Contrary to the above, as of July 15, 1983, OQA had not established specific written procedures or instructions, nor did OQA conduct surveillances in the following areas:

- o materials and/or services control;
- o inspection activities and personnel;
- o control of the test program;
- o inspection, test and operational status of components and systems and their repair; and
- o control, evaluation, and disposition of nonconforming material, parts and components, and repetitive nonconforming materials.

Response: This violation is interpreted as consisting of two parts. Part one is that as of July 15, 1983, OQA had not established specific written procedures or instructions describing their responsibilities in the above-listed areas of activity. Part two is that as of the same date, OQA had not conducted surveillances in those same areas of activity.

Specific OQA procedures addressing each of these areas of activity have been in effect since as early as 1975. Listed below are those procedures by title; OQA No.; date of original issue; and corresponding YQQAP-1-A (10 CFR 50, Appendix B) Section.

These procedures presently prescribe audits, inspections and/or surveillances to assure compliance with the areas of activity. These procedures will be reviewed and revised, as necessary, to incorporate the requirements for inspections and/or surveillances, as appropriate. In addition, YAEC will propose changes to the Yankee Operational Quality Assurance Program (YQQAP-1-A) to clarify that inspections and/or surveillances will be conducted to assure implementation of the areas of activity.

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<u>Title</u>	<u>OOA No.</u>	<u>Date of Original Issue</u>	<u>YOQAP-1-A Section</u>
Control of Purchased Materials, Equipment or Supplies	OOA VII-1	1/1/77	VII
Quality Assurance Inspections	OOA X-1	8/14/75	X
Quality Assurance Inspection Training	OOA X-2	6/1/82	X
Inspection	OOA X-3	2/25/77	X
Witness of Receipt Inspection	OOA X-4	8/15/77	X
Test Control	OOA XI-1	8/15/77	XI
Inspection, Test & Operating Status	OOA XIV-1	1/12/77	XIV
Nonconformances	OOA XV-1	8/15/77	XV
Corrective Action	OOA XVI-1	10/29/75	XVI

Part two of the violation is technically correct. "Surveillances" by title were not performed in the subject areas of activity. "Inspections," however, have been performed in all of these areas of activity on a continuing basis. It is believed that the OOA Program as implemented up to July 15, 1983, met fully the intent of 10 CFR 50, Appendix B.

Following the subject NRC inspection, QA initiated actions to ensure the performance of "surveillances" in addition to "inspections." Due to the synonymy of these two terms, OOA has established the principal difference to be one of timing. Inspections shall be predetermined and scheduled in advance. Surveillances may be performed impromptu.

Yankee Management has also recognized the NRC's concern with the OOA staffing level and has authorized the addition of three QA Engineers to the on-site staff in 1984.

These actions should be adequate to further assure effective implementation of the OOA Program and to meet the intent of 10 CFR 50, Appendix B.

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- C. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be prescribed by procedures and implemented thereto. The NRC approved Yankee Atomic Electric Company Operational Quality Assurance Topical (YOOAP-1-A) states that the plant is responsible for the preparation, approval and implementation of procedures associated with plant activities. Approved plant procedures AP 0021, Maintenance Requests, Revision 11, requires that any inspections or tests including surveillance test procedure numbers be defined and documented in the appropriate Maintenance Request blanks. It also states that the Material Issue Slip numbers be likewise recorded for any parts used on safety-related equipment or systems.

Contrary to the above, as of July 15, 1983, the following Maintenance Requests (MR's) did not provide consistent, accurate and complete information on the maintenance requests involving safety-related maintenance. The following examples are provided:

- o MR 83-0527, Reactor Circuit Breaker Failure. The words "operational" were entered into the operational testing blank and "breaker functions properly" was entered into the acceptance criteria blank.
- o MR 83-0999, Loss of SRM Position Indications. The word "operational" was entered into the operational testing blank and "verify proper setpoint" was entered into the acceptance criteria blank.
- o MR 83-1068, Torus Level Indicators Differing by 25%. The words "operational check" were entered into the operational testing blank and "proper operation" were entered into the acceptance criteria blank.
- o MR 83-0162, Replace Pressure Switch Isolation Valve. The words "shop stock" were entered into the parts used/material issue slip number blank.
- o MR 83-0921, "A" Diesel Room PCV-73-A Manual Override Stem Broken. Although the repairs performed blank states the valve stem was replaced the letters "N/A" were entered into the parts used/material issue slip number blank.

This is a Severity Level IV Violation (Supplement I).

Response: See Response to Item A.

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The following information is provided in response to a concern identified in the cover letter which forwarded the inspection report.

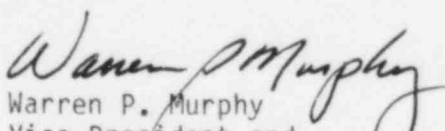
Response: The Yankee Atomic Electric Company acknowledges that, at the time of the subject inspection, the OOA staff was inadequate to effectively implement all of the QA functions of inspection, surveillance and audit of safety related activities. Since the above NRC inspection, the following corrective actions have been taken or are projected:

1. A Manager of Operations Quality has been assigned the responsibility for overview of on-site QA activities. This change was effective September 12, 1983.
2. Three QA Engineers will be added to the Operations Quality staff at the Vermont Yankee plant in 1984.
3. During the interim, QA Engineers will augment the Vermont Yankee on-site QA staff to implement the inspection and surveillance programs for safety related activities.
4. The in-plant audit program has been reassigned to a new Quality Audit and Engineering Group. This group will have primary responsibility for the audit program, providing on-site personnel with more time for operational inspections and surveillances. This change was effective September 12, 1983.

We trust this information will be satisfactory; however, should you have any questions or desire additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations