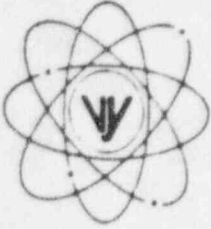


VERMONT YANKEE NUCLEAR POWER CORPORATION

Licensee Response to NRC Letter Date
2/9/96 (RI-95-A-0222)



Ferry Road, Brattleboro, VT 05301-7002

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

February 26, 1996

BVY 96-17

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Reference: (a) Letter, USNRC to VYNPC dated February 9, 1996

- Attachments: 1. Response to NRC letter dated February 9, 1996
2. Vermont Yankee Investigation Team Report modified for public disclosure
3. Vermont Yankee Investigation Team Report withheld from public disclosure

Subject: Response to request for information pertaining to anonymous allegation


As requested in your letter dated February 9, 1996, Vermont Yankee is submitting information concerning anonymous allegations pertaining to the function and management of our Advanced Off-Gas System (AOGS).

Enclosure 3 contains proprietary information and as such shall be separated from this report and withheld from public disclosure in accordance with 10 CFR 2.790 (b).

I hope this responds to your request for information. If you need any further information, please don't hesitate to contact me.

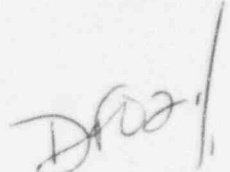
Sincerely,

Vermont Yankee Nuclear Power Corporation


Donald A. Reid
Vice President, Operations

cc: USNRC Region I Administrator
USNRC Resident Inspector - VYNPS
USNRC Project Manager - VYNPC

060011



9603110030

public per: memo to Jean Lee from Cynthia O'Daniell
XA 5/6/96

Attachment 1

Vermont Yankee first learned of the allegation on December 28, 1995 when we received information from the Brattleboro Reformer (a local newspaper) that it had received a copy of an unsigned and undated allegation concerning our Advanced Offgas System (AOGS). An immediate review was conducted by Vermont Yankee to assess the significance of the allegation and take any appropriate short term actions. An immediate assessment was performed to ensure the AOGS was operable by reviewing the current plant and system status, assessing the significance of any equipment that was out of service (which there were none) and discussing the issue with plant Engineering. Based on this review, we concluded there was no immediate operability concern and there was no evidence to substantiate that Vermont Yankee was discharging illegal amounts of radioactivity. On December 29, 1995, an Investigation Team was appointed by the President of Vermont Yankee to provide a more in depth investigation of the allegations.

The Investigation Team completed its review and submitted a final report to the President on January 17, 1996. The report has been made available to the Vermont State Nuclear Engineer, the NRC Resident Inspectors and the Vermont Yankee NRR Project Manager.

The report completed by the Investigation Team addresses many of the requests for additional information in your February 9, 1996 letter. The full report is being provided as attachment 3. However, since two of the five allegations discuss specific individuals, the portions of the report pertaining to them are being withheld from public disclosure per 10 CFR 2.790(b). This abbreviated version of the report is being provided as attachment 2 for public disclosure.

By reference (a), you requested responses to 6 specific questions. The following is a restatement of the question and our response.

Question 1

Your perspective on the calibration problem with the hydrogen monitor, how long the problem existed, and the root cause of the T.S. error along with corrective actions. Also, provide information on when a license amendment will be submitted for NRC staff review.

Response

With regard to the hydrogen monitor, the Investigation Team reviewed operations logs, Chemistry Department calibration procedures, and calibration and surveillance results and found no evidence of the hydrogen monitors being out of service longer than that allowed by our Technical Specifications. The Investigation Team concluded that the allegation was most likely referring to a question of the operability of the hydrogen detectors that was identified during an unscheduled shutdown on December 8, 1995. The issue concerned the proper gas to be used for the calibration of the hydrogen detectors. The department performing the calibration identified a discrepancy between the procedural guidance and the Technical Specification for the type of gas to be used to calibrate the detectors during the December outage. As a conservative measure, the

detectors were declared inoperable and the appropriate Technical Specification compensatory measures were initiated.

A subsequent evaluation determined that the detectors were operable and that they had been calibrated properly in accordance with the manufacturer's recommendation. The review did identify that the current Technical Specification was in error in that an improper span gas was specified. However, the correct span gas was specified in the calibration procedure. This discrepancy existed since 1984 when the Radiological Effluent Technical Specification (RETS) change was approved. The span gas specified in the Technical Specifications is that which was specified generically in NUREG 0472 and was not specific to Vermont Yankee. A formal Root Cause evaluation is being performed on the error and will be documented in an Event Report.

A proposed change to the Vermont Yankee Technical Specification was submitted to the NRC on February 5, 1996 to correct the error. For more information on this allegation please reference Allegation 4 on page 9 of the Investigation Team's report.

Question 2

Provide information on any other critical monitoring equipment that is or was inoperable since the last refueling outage along with root cause and corrective action taken or planned.

Response

The Investigation Team reviewed Operation Department's logs to determine if any "critical monitoring equipment" was or had been inoperable. Since the allegation centered around the AOGS, the Team focused on equipment related to the that system and equipment designed to monitor the release of radioactivity. The Investigation Team found no evidence of any "critical monitoring equipment" that has been out of service since the last refueling outage or out of service longer than that allowed by our Technical Specifications.

We are currently reviewing the hydrogen detection system surveillance procedure to assure proper system testing.

Question 3

Current status of the offgas system, including any outstanding work requests and planned modifications.

Response

Both trains of the AOGS are completely operable. All current work requests, which include normal preventive maintenance tasks and surveillances, have been prioritized and integrated into the work control process. There are no level 1 (high priority) work orders open for the AOGS. There are two redundant trains of the AOGS. Each one has minor corrective

maintenance requests open but none affect the operability of the system. There is one potential minor modification pending that would relocate an AOG steam trap. The minor modification package has been developed and is in the planning and scheduling process.

Question 4

Summary of any known recent (since the last refueling outage) offgas system problems by plant staff or as documented in Vermont Yankee Event Reporting system along with completed or planned resolution.

Response

A review of Event Reports was completed to identify any recent AOGS problems. No Event Reports have been identified that address problems with the operability of the system. However, some Event Reports have been initiated to address issues such as drawing discrepancies, scheduling of calibrations, and logging "out of service annunciators", none of which affected system operability.

Question 5

Basis for postponement or cancellation of preventative/corrective maintenance or any modifications to the offgas system from the 1995 outage.

Response

The basis for cancellation of the originally planned 1995 outage design change is detailed in the Investigation Team's response to allegation 2 on page 4 of the report. To summarize, the design change was cancelled because the entire design package was not completed in time to support the outage. A portion of the original scope of the design change (wiring verifications, reconfiguration of neutral conductors, and as built drawing updates) was implemented during the 1995 outage as minor modifications. The portions of the design change not completed were put on the work list for future consideration.

Question 6

Provide details on any management/personnel disciplinary actions completed or planned associated with decisions related to the offgas system, and its modifications, since the last refueling outage.

Response

As discussed above, particular sections of the Investigation Team's report (attachment 2) which refer to individuals has been withheld in accordance with 10 CFR 2.790.