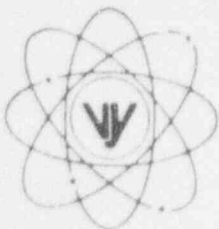


# VERMONT YANKEE NUCLEAR POWER CORPORATION



P.O. Box 157, Governor Hunt Road  
Vernon, Vermont 05354-0157  
(802) 257-7711

September 4, 1996  
BVY 96-100

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

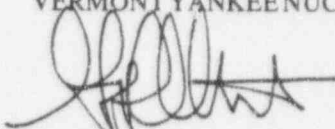
Reference: (a) License No. DPR-28 (Docket No. 50-271)

Subject: Reportable Occurrence No. LER 95-14 Supp. 3

As defined by 10CFR50.73, we are reporting the attached Reportable Occurrence as LER 95-14, Supplement 3.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

  
for Robert J. Wanczyk  
Plant Manager

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

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<b>LICENSEE EVENT REPORT (LER)</b>											
<b>FACILITY NAME (1)</b> VERMONT YANKEE NUCLEAR POWER STATION						<b>DOCKET NUMBER ( )</b> 05000271		<b>PAGE (3)</b> 01 OF 08			
<b>TITLE (4)</b> INCOMPLETE IMPLEMENTATION OF 10CFR50 APPENDIX "R" BASED ON IDENTIFIED DEFICIENCIES IN THE SAFE SHUTDOWN CAPABILITY ANALYSIS											
<b>EVENT DATE (5)</b>			<b>LER NUMBER (6)</b>			<b>REPORT DATE (7)</b>			<b>OTHER FACILITIES INVOLVED (8)</b>		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NO.(S)	
07	25	95	95	-- 014 --	03	09	04	96	N/A	05000	
<b>OPERATING MODE (9)</b>		<b>THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: CHECK ONE OR MORE (11)</b>									
NA		20.2201(b)		20.2203(a)(2)(v)		50.73(a)(2)(i)		50.73(a)(2)(viii)			
<b>POWER LEVEL (10)</b>		20.2203(a)(1)		20.2203(a)(3)(i)		X 50.73(a)(2)(ii)		50.73(a)(2)(x)			
94		20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71			
		20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER			
		20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		(Specify in Abstract below or in NRC Form 366A)			
		20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)					
<b>LICENSEE CONTACT FOR THIS LER (12)</b>											
<b>NAME</b> ROBERT J. WANCZYK, PLANT MANAGER								<b>TELEPHONE NO. (Include Area Code)</b> 802-257-7711			
<b>COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)</b>											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		
NA					NA						
NA					NA						
<b>SUPPLEMENTAL REPORT EXPECTED (14)</b>					<b>EXPECTED SUBMISSION DATE (15)</b>		MO	DAY	YEAR		
YES (If yes, complete EXPECTED SUBMISSION DATE)				X	NO						

**ABSTRACT** (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On 07/25/95, at 1410 hours, an ongoing review of documents and correspondence associated with 10CFR50 Appendix "R" determined that the "hot short" concern described in NRC Information Notice 92-18 was applicable to Vermont Yankee such that the operation of various Motor Operated Valves, from Alternate Shutdown Panels, could be impacted in the event of a fire in one of four plant areas. Subsequent to this discovery, additional Appendix "R" vulnerabilities were identified such that certain fire scenarios could result in loss of the Reactor Core Isolation Cooling (RCIC) system in the Alternate Shutdown mode, or inadvertent primary system depressurization. Also in question is the ability to initiate RCIC from the Alternate Shutdown Panel in the time necessary to meet Appendix "R" requirements. The root cause(s) of these events have been thoroughly investigated by an independent, multi-disciplined task team. Modification to achieve full compliance with Appendix "R" requirements, are planned for completion by no later than the end of the 1996 Refueling Outage.

This supplement to LER 95-14 provides an update on Appendix R compliance issues and updates commitments from LER 94-11 and 95-03.

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#### DESCRIPTION OF EVENT

On 07/25/95, at 1410 hours, with the reactor at 94% of rated power, an ongoing review of documents and correspondence associated with 10CFR50 Appendix "R" determined that the "hot short" concern described in NRC Information Notice 92-18 was applicable to Vermont Yankee such that the operation of various Motor Operated Valves (MOVs) from Alternate Shutdown Panels could be impacted in the event of a fire in certain plant areas. Specifically, the issue involves the potential impact of a fire in the Control Room, Cable Vault, or Reactor Building Fire Zones RB-1 or RB-3, on plant equipment relied upon in the Vermont Yankee Safe Shutdown Capability Analysis (SSCA) for placing and maintaining the reactor in "cold shutdown." This condition potentially renders the plant outside design basis in that it is not enveloped by the present Appendix "R" analysis. Based on this discovery, the Resident NRC Inspectors were briefed, and compensatory measures (fire watches) were promptly put into place such that the intent of 10CFR50 Appendix "R" was satisfied. In addition, copies of the associated Event Report and NRC Information Notice 92-18 were placed in the Operations Night Order Log Book for heightened operator awareness of the issue.

On 07/26/95, the subject "hot short" Event Report was reviewed at length by the Plant Operations Review Committee (PORC). Topics of discussion included: 1) the need to review actions contained within the related operating procedures, 2) the questioning of the potential for Safety Relief Valve (SRV)(EIS=SB) cable vulnerability, and 3) the recommendation to develop a task force to pursue resolution of this issue. Based on the PORC meeting, an Operations Standing Order was issued to establish formal guidance on the implementation of additional fire prevention controls in the susceptible areas, and convey management's intent to have operators initiate a reactor SCRAM and bring the plant to "cold shutdown" in the event of a confirmed fire that affects plant equipment in the Control Room, Cable Vault, or in Reactor Building Fire Zones RB-1 or RB-3. These compensatory measures were discussed at the 07/27/95 plant management morning meeting for increased awareness of the current Appendix "R" issues.

On 07/27/95, a follow-up to one of the questions raised by PORC during their review of the "hot short" concern identified a deficiency in the SSCA relative to the specific response to a fire in Reactor Building Zone RB-3. The analysis credits use of the Reactor Core Isolation Cooling (RCIC) system (EIS=BN) in the Alternate Shutdown mode, and repair of a cable for manual operation of a Safety Relief Valve. However, it was determined that additional wire and terminations for the SRV could be damaged for a fire in this area, making repair of the circuit unachievable. As a result, on 07/28/95, at 0000 hours, with the reactor at 100% of rated power, an event report for this issue was submitted, and compensatory measures were taken to satisfy the intent of Appendix "R" requirements.

On 07/28/95, Vermont Yankee management announced the formation of three task force teams to investigate the recently identified Appendix "R" issues. At the 07/31/95 plant management morning meeting, the function and scope of review of these (Evaluation, Design Change, and Self Assessment) teams were outlined. Subsequently, investigations by the task teams identified additional Appendix "R" vulnerabilities in the same plant fire zone areas. Specifically, under certain fire scenarios, loss of RCIC function in the Alternate Shutdown mode or inadvertent primary system depressurization could result from fire damage to RCIC or SRV cabling. Based on this, the existing compensatory (fire watch) measures were readjusted to account for the additional findings.

On 08/17/95, the formation of a fourth independent, multi-discipline Root Cause Analysis team was announced. This team completed a formal root cause analysis of the subject Appendix "R" events on September 22, 1995.

On 08/23/95, at 1030 hours, with the reactor at 100% of rated power, the ongoing review of Appendix "R" issues identified that the computer output documentation associated with the calculation which established the time available to get Alternate Shutdown Systems in service could not be found, and the results of this calculation could not be validated utilizing present day analysis techniques. The original calculation, performed in 1981, determined that 43 minutes were available.

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Recent re-analysis, however, indicates that a period of 31 minutes can be justified at this time. Based on the current evaluation using conservative design basis assumptions, there may be insufficient time for operators to initiate RCIC in the Alternate Shutdown mode in the time necessary to meet Appendix "R" requirements. As a result, this concern was immediately brought to management's attention, an event report was submitted, and additional (firewatch and personnel awareness) measures remain in place to compensate for the discrepancy.

On 08/23/95, at 1705 hours, with the reactor at 100% of rated power, an Appendix "R" related issue associated with RCIC steam isolation logic was identified. It was determined that some of the high temperature sensors used to identify and isolate a RCIC high energy line break (HELB), may be susceptible to inadvertent actuation during certain fire scenarios. This could potentially result in an isolation of the RCIC turbine steam supply where the system is currently taken credit for in the Safe Shutdown Capability Analysis. The analysis relies on the use of RCIC for a fire in Reactor Building Fire Zone RB-2 and identifies the potential need for operator actions in manually operating various RCIC valves for system operations. However, the potential closure of the RCIC steam isolation valves was not identified. As a result, this issue was immediately brought to management's attention, an event report was submitted, and additional (firewatch and personnel awareness) measures were put in place to compensate for the discrepancy.

On 09/10/95, the formation of an Appendix "R" Project Team consisting of senior personnel from the Vermont Yankee and Yankee Atomic organizations was announced. The primary mission of this team will be to: 1) address all open issues identified by the analysis teams, 2) rewrite the Safe Shutdown Capability Analysis, 3) identify any necessary design changes, and 4) ensure the Vermont Yankee Appendix "R" Program becomes a well documented and comprehensive program.

On 10/20/95 Vermont Yankee identified that 3 issues identified at WNP-2 in NRC Inspection Report 50-397/94-2 may be applicable to Vermont Yankee. The issues involve potential RHR pump damage, potential RHR system water hammer, and potential bypass of reactor vessel overfill protection. Vermont Yankee has concluded that these issues are not addressed in the current Appendix R analysis and potentially render Vermont Yankee outside of its design basis and that the existing compensatory actions adequately address these issues. The adequacy of the compensatory measures in place were reviewed by the Appendix R Project Team and augmented as necessary.

Vermont Yankee has also initiated the following evaluations to document findings and corrective actions on Appendix R issues. These items have been determined not to be reportable but are included in this LER for information. The adequacy of the compensatory measures in place were reviewed by the Appendix R Project Team and augmented as necessary.

On 10/31/95 Vermont Yankee initiated an evaluation of issues identified by the Appendix R Project Team regarding the exact location of the Combustible Free Zone (CFZ) in the Northwest Torus Area and proper application of fire retardant material on cable trays within the CFZ. The adequacy of the compensatory measures in place were reviewed by the Appendix R Project Team and augmented as necessary.

On 10/31/95 Vermont Yankee initiated an evaluation of issues identified by the Assessment team regarding: 1) identification of two uncoated cables within a CFZ, 2) identification of two cable trays which were not included in the procedure for fire barrier surveillance, 3) identification of conduits spanning a combustible free zone that may not be fire stopped as required and 4) several typographical errors in the Appendix R documentation. The adequacy of the compensatory measures in place were reviewed by the Appendix R Project Team and augmented as necessary.



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On December 5, 1995, Vermont Yankee initiated an evaluation of issues identified by the Appendix R Project Team regarding the routing of both the normal and alternate dc power feeds to the RCIC turbine speed controller through one Reactor Building Fire Zone, RB-3. This condition potentially renders the plant outside design basis in that it is not enveloped by the present Appendix R analysis. The adequacy of the compensatory measures in place were reviewed by the Appendix R Project Team and augmented as necessary.

On January 19, 1996, Vermont Yankee initiated an evaluation of issues identified by the Appendix R Project Team regarding the use of Fire Zone R cable which has been used as a one-hour fire rated cable in several locations in the plant. During the Appendix R project's ongoing work it was identified that: 1) Generic Letter 86-10 identifies that the use of high temperature cables such as Fire Zone R cable requires an exemption request, 2) Vermont Yankee had not submitted an exemption request for use of this type of cable and 3) it is not clear whether an exemption request was needed for the use of a one-hour rated enclosure for the ADS System in the Control Room. These conditions potentially render the plant outside the design basis in that it is not enveloped by the present Appendix R analysis. The adequacy of the compensatory measures in place were reviewed by the Appendix R Project Team and augmented as necessary.

On March 13, 1996, Vermont Yankee initiated an evaluation of issues identified by the Appendix R Project Team regarding ammeter cables running from the 4160 V alternate shutdown loads in the Switchgear Room through the Cable Vault to the Control Room. The review has identified that a fire-induced "Hot Short" in the Control Room or the Cable Vault that affects the ammeter circuits could spuriously actuate the overcurrent relay and spuriously trip the safe shutdown loads. Because the ammeter circuit is not isolated from the fire area, the load may not be able to be reclosed by the operator from the Switchgear Room. The spurious operation of the overcurrent relay due to a hot short in the ammeter circuit is not addressed in the Alternate Shutdown (ASD) correspondence. The adequacy of the compensatory measures in place were reviewed by the Appendix R Project Team and augmented as necessary.

On March 26, 1996, Vermont Yankee initiated an evaluation identified by the Appendix R Assessment Team regarding the cable routing for the RRU 7 and RRU 8 ECCS Corner Room Coolers and RHR pump minimum flow valves. Although electrical separation is maintained in the circuits communicating between switchgear rooms, the wiring configuration, when subjected to certain fire damage, is such that a fire in either switchgear room may result in rendering both RRU 7 and RRU 8 unavailable. Also, the RHR minimum flow valves circuits are similarly configured. Preliminary analysis of Corner Room heatup without cooling from RRU 7 or RRU 8 indicates that unacceptable steady-state temperatures could result. The adequacy of the compensatory measures in place were reviewed by the Appendix R Project Team and augmented as necessary.

On March 28, 1996, Vermont Yankee initiated an evaluation of issues identified by the Appendix R Project Team regarding the need to evaluate the effectiveness of the communication systems available for use during fire events. The communication systems include the Plant Paging System (Gaitronics), the Sound Power Phone System, and portable radios maintained in the Control Room for use if a shutdown outside the Control Room is required. The present communications systems available to the operators for performing a shutdown outside the Control Room, are not adequate to ensure completion of OP-3126 within the existing timelines. The adequacy of the compensatory measures in place were reviewed by the Appendix R Project Team and augmented as necessary.

On March 28, 1996, Vermont Yankee initiated an evaluation of issues identified by the Appendix R Project Team regarding drywell heatup and the safety-relief valve nitrogen supply. The current Safe Shutdown Capability Analysis (SSCA) does not address the potential for a loss of drywell cooling and the consequent heatup. Preliminary heatup analysis results indicate that the drywell air space temperature will reach 280°F in approximately one hour.

Drywell Cooling Equipment and Drywell Temperature Monitoring are not presently defined as Required Safe Shutdown

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Equipment. For a fire event in which drywell cooling is lost, or in which drywell temperature monitoring is lost, there is presently no operating strategy procedurally defined to maintain the governing parameter: drywell design temperature, drywell air space temperature, and reactor level instrument reference leg temperature.

The current revision of the SSCA identifies that the safe shutdown strategy for a fire in RB-4 involves depressurizing the reactor, flooding the vessel using the Core Spray System, supplying a return path to the torus through an open SRV and then cooling the torus with the RHR System. In order to maintain this flow path for a long-term shutdown, nitrogen or air must be supplied to the SRVs via the Containment Air System. Neither the SSCA or the current operating procedures identify the need to restore makeup to the Containment Air System in the event of a fire in RB-4.

Drywell heatup and SRV nitrogen supply potentially render the plant outside of its Appendix R design basis. The adequacy of the compensatory measures in place were reviewed by the Appendix R Project Team and augmented as necessary.

On June 19, 1996, Vermont Yankee initiated an evaluation by the Appendix R Assessment Team regarding separation zone routing discrepancies. The Appendix R Project Team identified that: 1) Vermont Yankee did not meet requirements of an exemption which permits 18 feet separation between redundant trains in lieu of 20 feet of separation in the northwest corner area of the Reactor Building, 2) on Elevation 280' of the Reactor Building in the Recirculation System M/G set area, two redundant 24 V dc feeds from two 24 V ECCS distribution panels to two redundant ECCS analog trip cabinets do not meet the requirement of Appendix R by being protected by an equivalent 1-hour barrier, and 3) on Elevation 280' in the Reactor Building, one of the feeds from the 24 V dc ECCS distribution panels to the ECCS analog trip cabinet is routed for approximately 8 feet within a combustible free zone. The adequacy of the compensatory measures in place were reviewed by the Appendix R Project Team and augmented as necessary.

On July 11, 1996, Vermont Yankee initiated an evaluation by the Appendix R Project Team regarding Appendix R barriers separating adjacent fire areas. It was determined that the radwaste hallway (Fire Area FA-13) does not have an Appendix R barrier separating it from the adjacent fire area FA-7 (Turbine Building), and that the current SSCA (Revision 4) treats FA-7 and FA-13 as separate areas. The adequacy of the compensatory measures in place were reviewed by the Appendix R Project Team and augmented as necessary.

#### CAUSE OF EVENT

The root and contributing causes of these events have been determined by an independent multi-discipline team. The Root Cause Team identified the following:

##### Root Causes:

1. Weaknesses in the safe shutdown capability analysis.
2. Content and control of Appendix R documentation was weak in describing overall compliance.
3. Lack of overall understanding of Appendix R requirements.

##### Contributing Causes:

1. Lack of ownership / oversight / coordination
2. Appendix R not considered a living document
3. Depth of understanding.

The corrective actions identified in this report shall address the root and contributing causes.

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## ANALYSIS OF EVENT

Plant fire protection systems and barriers are classified Non-Nuclear Safety. However, they protect and separate various areas containing safety related, safe shutdown equipment to ensure the reactor can be brought to and maintained in "cold shutdown" in the event of any analyzed in-plant fire. Although the events detailed in this report are significant in that they involved non-compliance with a regulatory licensing requirement, no equipment or systems have been rendered inoperable as a result of the identified conditions. The conditions involve deficiencies in some of the features credited for providing compliance with the specific requirements of 10CFR50 Appendix "R" for which compensatory measures have been taken. These measures supplement the normal fire detection and protection features, and include: continuous and roving firewatches, the limiting of combustible materials in the affected areas, and the application of additional controls to restrict hot work in these areas. In each case, as Vermont Yankee identified deficiencies in the implementation of Appendix "R" requirements, the NRC was promptly informed of the issues and corresponding compensatory measures that were put in place until the deficiencies are fully resolved.

With regard to recent industry concerns associated with TSI Thermo-Lag material, Vermont Yankee no longer relies on this type of fire wrap for meeting Appendix "R" safe shutdown requirements. Therefore, this industry issue does not impact the identified Appendix "R" issues at the plant.

The 08/23/95 issue associated with the time available to get Alternate Shutdown Systems in-service is significant in that margin is reduced, and for the limiting design basis Appendix "R" fire scenario, the RCIC System may not be initiated in the time necessary to meet Appendix "R" requirements and some minor core heatup may occur. However, the probability of experiencing this limiting design basis scenario (i.e. extreme fire damage affecting all core injection systems, spurious valve mispositioning, and multiple blown fuses) is considered low. Furthermore, even assuming conservative design basis fire events, no core damage is predicted.

Because the conditions represented non-compliance with a regulatory requirement, Vermont Yankee has established continuous dialogue with the NRC and will continue to provide frequent updates of the status of Appendix "R" issues. On October 16, 1995 Vermont Yankee staff met with NRC Region I staff at the Vermont Yankee site to review the Vermont Yankee status. During the weeks of October 20 and November 6, 1995 an NRC Region I inspection / assessment of Appendix R was performed at Vermont Yankee. The interaction with the staff provided better understanding of the Appendix R issues at Vermont Yankee, Vermont Yankee's plan for corrective action and NRC expectations for full compliance. On March 5, 1996 and August 1, 1996 members of the VY Appendix R Project team met with NRC Region I and NRR staff at the Bethesda headquarters to provide an update on the status of our corrective actions and information on several exemption requests.

As each new Appendix R issue was identified, the safety significance of the individual issue, cumulative effect of the previously identified issues and adequacy of the compensatory actions were reviewed by the Appendix R Project Team and plant management. The compensatory actions were augmented as necessary to ensure that the potential for a fire is acceptably low for the known deficiencies. Vermont Yankee has sensitized plant staff and operators to fire protection controls by night orders, training, and daily rounds by the Fire Protection Coordinator. Based on these reviews and compensatory actions that were immediately implemented, Vermont Yankee believes that the health and safety of the public continues to be assured.

## CORRECTIVE ACTIONS

### Immediate:

1. Compensatory measures consisting of firewatches, equipment monitoring, administrative controls and enhanced

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awareness of potential Appendix "R" vulnerabilities have been implemented. (Status: See Note 1)

2. An Operations Standing Order has been issued to provide details of the conditions and specify operator actions for response to particular fire scenarios in the areas determined to be vulnerable. (Status: See Note 1)

[Note 1: Immediate Corrective Actions 1 and 2 were instituted to ensure the intent of 10CFR50 Appendix "R" is satisfied. These measures have been and will continue to be adjusted, as necessary, upon identification of any additional concerns.]

3. Vermont Yankee has established periodic dialogue with the NRC and will continue to provide frequent updates of the status of the subject 10CFR50 Appendix "R" issues.
4. As each item was discovered an Event Report was written and the corrective action process was entered.

Short Term:

1. A Self Assessment team was assembled to ensure any additional vulnerabilities were promptly identified. The team reviewed the Vermont Yankee Safe Shutdown Capability Analysis to verify key assumptions and conclusions for each fire zone are acceptable. This included design, procedural, licensing, staffing, and training aspects. The Team was comprised of five senior personnel, with diverse backgrounds, from Vermont Yankee, Yankee Atomic and external organizations, none of whom had significant involvement in the original program development. The Self Assessment began on 08/07/95, and was completed on 09/08/95. (Status: Complete)
2. An Evaluation team was established for review of concerns, operability considerations, compensatory measures, procedures, and analytical solutions. The team was formed on 07/28/95 and completed its efforts on September 29, 1995. (Status: Complete)
3. A Design Change team was established on 07/28/95 to evaluate conceptual designs that may be required for resolution of some of the identified Appendix "R" deficiencies. (Status: Reassigned; see Short Term Corrective Action #5.)
4. An independent, multi-discipline Root Cause Analysis team was formed to determine root and contributing causes of these events. This team was fully assembled on 08/28/95. Their final report was issued on September 22, 1995 (Status Complete)
5. On 09/10/95, the formation of an Appendix "R" Project Team consisting of senior personnel from the Vermont Yankee and Yankee Atomic organizations was announced. The primary mission of this team will be to: 1) address all open issues identified by the analysis teams, emerging industry issues or NRC interaction; 2) rewrite the Safe Shutdown Capability Analysis; 3) identify any necessary design changes, and 4) ensure the Vermont Yankee Appendix "R" Program becomes a well documented and comprehensive program. (Expected Completion Date: Fall 1996 Refueling Outage)
6. On 11/6/95, a Lead Project Engineer for the Fire Protection and Appendix R Improvement Programs was assigned by the Vice President of Engineering to directly manage these programs, addressing ownership, coordination and oversight.



NRC Form 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION  <b>LICENSEE EVENT REPORT (LER)</b>		APPROVED BY OMB NO. 3150-0104 EXPIRES 04/30/98 ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20566-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.		
<b>FACILITY NAME (1)</b>	<b>DOCKET NUMBER (2)</b>	<b>LER NUMBER (6)</b>		<b>PAGE (3)</b>
VERMONT YANKEE NUCLEAR POWER CORPORATION	05000271	YEAR 95	SEQUENTIAL NUMBER -- 014 --	REV # 03
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Long Term:

1. The Appendix R Project Team has assessed the need for more explicit operator procedures for certain Appendix R fire scenarios and has determined that more explicit guidance should be developed where necessary. Additional guidance will be developed by the Appendix R Project Team. (Expected Completion Date: End of Fall 1996 Refueling Outage)
2. With the exception of five exemption requests previously submitted, full compliance with Appendix "R" requirements, will be achieved by the end of the 1996 Refueling Outage. Appropriate compensatory measures will remain in place until the exemption requests are approved or otherwise resolved.
3. The Safe Shutdown Capability Analysis will be rewritten prior to start up to address the issues described in this LER. The previous due dates for training in LER 94-11 and LER 95-03 have been revised and discussed with the NRC resident inspector.  
(Revised Completion Date for rewrite of the SSCA and training for operators in revised safe shutdown strategies is Fall 1996 Refueling Outage. The revised completion date for training engineers responsible for performing design changes is December 1996.)

ADDITIONAL INFORMATION

Similar events related to the implementation of 10CFR50, Appendix "R" were reported to the Commission under the following Licensee Event Reports:

- |           |   |
|-----------|---|
| LER 93-01 | "Degraded vital fire barriers due to inadequate documentation of assumptions and inadequate procedures"   |
| LER 94-11 | "Failure to properly identify all areas requiring emergency lighting units in accordance with 10CFR50 Appendix R, Section III.J"                            |
| LER 95-03 | "Failure to provide required emergency lighting in an area in accordance with 10CFR50 Appendix R, Section III.J due to a failure in the management system." |
| LER 95-04 | "Incomplete repair of inoperable vital fire barrier penetration fire seal."   |

It is recognized that the events of this report are of concern when considered in conjunction with previous weaknesses in the fire protection and Appendix "R" areas. As a result of the recently combined Triennial/Annual Fire Protection Program Audit, a Fire Protection Program Improvement Team has been formed to assess the overall program and review the Fire Protection program base documents against the current regulatory documents. In addition, considerable improvement efforts were already underway in the SSCA as a result of the corrective actions from previously identified fire barrier and lighting issues. The findings of the task teams will be considered together with the other ongoing efforts, in determining the actions required to ensure continual improvement in the fire protection program.