

# YANKEE ATOMIC ELECTRIC COMPANY

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FYR 85-58

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May 22, 1985

United States Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, PA 19406

Attention: Dr. Thomas E. Murley, Regional Administrator

References: (a) License No. DPR-3 (Docket No. 50-29)  
(b) I&E Letter to YAEC, dated March 22, 1985, I&E Inspection  
No. 50-029/85-01

Subject: Response to Inspection 50-029/85-01

Dear Sir:

Reference is made to I&E Inspection Report No. 50-029/85-01 conducted by your Messrs. J. Prell and W. Oliveira on January 15-18, 1985 at the Yankee Nuclear Power Station at Rowe, Massachusetts. The report made subsequent to that inspection identified an item which apparently was not conducted in full compliance with NRC requirements. In accordance with Section 2.201 of the NRC's "Rules and Practices," Part 2, Title 10 Code of Federal Regulations, we hereby submit the following information:

## APPARENT VIOLATION

Yankee Rowe Technical Specification 6.8.1 states in part: "Written procedures shall be established, implemented and maintained that meet or exceed the requirements and recommendations of ...Appendix "A" of USAEC Regulatory Guide 1.33..." This appendix requires procedures for assuring procedural adherence and for control of maintenance, repair, replacement and modification work.

Administrative Procedure AP-0209, "Quality Control Inspections," states in part:

- a. "Inspections of activities requiring quality assurance shall be performed in accordance with approved written procedures, which set forth the requirements and acceptance limits and specify the inspection responsibilities."
- b. "The plant is responsible for writing and approving inspection instructions and checklists."

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- c. "The plant is responsible for providing qualified personnel...for examination to assure quality work."
- d. "Procedures developed for inspection of activities requiring quality assurance shall provide for the evaluation of inspection results along with test results to determine whether the individual inspection and test programs demonstrate that the plant can be operated safely and as designed."
- e. "Records shall be kept in sufficient detail to permit adequate confirmation of the inspection program."
- f. "Inspection records shall be identified as such and shall be retrievable."

Contrary to the above, as of January 16, 1985, the licensee did not establish written inspection procedures which set forth the requirements, acceptance limits, and inspection responsibilities; did not write or approve inspection instructions and checklists; did not identify or provide qualified individuals for examination to assure quality work; did not provide for the evaluation of inspection results to determine if the plant could be operated safely and as designed; did not have records to permit adequate confirmation of the inspection program; and did not have identifiable or retrievable inspection records.

Lack of an adequate inspection program is exemplified by the following job orders: JO 84-128, JO 84-319, JO 84-321, JO 84-333, JO 84-344, JO 84-291, JO 84-296, JO 84-299, JO 84-313, JO 84-316 and JO 84-317 wherein maintenance activities were performed without quality inspections.

This is a Level IV violation (Supplement I) applicable to DPR-3.

#### RESPONSE

Although we are taking steps to bring our Inspection Program into compliance with the requirements of our Administrative Procedures, a brief clarification of our inspection activities to date is in order.

The Quality Inspection Program, which has been in effect since August 1975, has been, by design, a second level Quality Assurance "surveillance" activity. YAEC has always been a strong proponent of the philosophy on inspections as expressed in ANSI N18.7, as follows:

"These independent inspections, i.e., those performed by individuals not assigned first-line supervisory responsibility for the conduct of the work, are not intended to dilute or replace the clear responsibility of first-line supervisors for the quality of work performed under their supervision."

Belief in and support of this philosophy of pride in workmanship has been a major factor in support of our reputation for 25 years of safe and efficient plant operation. Quality Inspections have always been performed by qualified individuals; and have been documented as Quality Assurance Records.

The Operations Quality Group was involved in 100% of all safety-related activities through document review, field inspection and/or audit of field documentation packages. In over one-third of these activities, the Operations Quality Group performed field verification (inspection) of work performed.

#### Actions Taken

Subsequent to the inspection, a decision was made to formulate a Quality Control Group under the Quality Assurance Department. This group has the responsibility for ensuring, through the inspection program, that activities requiring quality assurance meet their predetermined requirements. A Quality Control Supervisor has been assigned and is presently formulating the program and plans necessary to formalize and enhance the existing quality control activities. Meetings with Plant Management have been, and will continue to be, held to identify inspection activities which are to be assumed by the Quality Control Group.

#### Corrective Actions Planned

- a. Inspections presently being performed by the Operations Quality Group will be redesignated as Quality Assurance Surveillances.
- b. Quality Control Inspections will be performed by, and will be the responsibility of the Quality Control Group.
- c. Procedure AP-0209, Quality Control Inspections, will be revised to reflect the inspection responsibilities of the Quality Control Group. The interface between the inspections performed by the QC Group and those which will continue to be performed by Plant Personnel will be clearly delineated.
- d. Quality Control Group implementing inspection procedures and inspection instructions and checklists will be prepared to meet the requirements of AP-0209. Where necessary, additional inspection procedures or modifications to existing procedures will be made by the plant to meet the requirements of AP-0209. These procedures will include, where necessary, measures for evaluating the inspection results for demonstration that the plant can be operated safely and as designed.
- e. The procedures will include requirements that those inspections performed to meet requirements of the Quality Control Inspections Procedure AP-0209 be documented and retained as retrievable records.

Date When Full Compliance Will Be Achieved

Actions have been initiated to implement the planned corrective actions. Quality Control Group staffing was begun in April 1985. Procedures are being prepared and additional staffing is being added in order to bring the QC inspection program into full compliance by the end of the 1985 Refueling.

OTHER INFORMATION RELEVANT TO THE INSPECTION REPORT

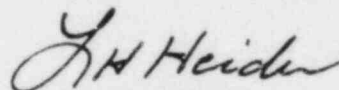
Section 4.2 of the Inspection Report states that "QA&EG is in the process of establishing a trending program of audits and NRC findings, licensee event reports, plant inspection reports, and nonconformance reports. This program has not yet been formally documented."

In fact, the trending program described above has been in place since 1983. The report format has been revised to provide fewer graphs and charts, and improved analysis of the trends. This approach has enhanced the effectiveness of the trend reports and provided a more meaningful management tool. We are also endeavoring to provide improved computerization of the tracking, trending, and evaluation of identified conditions.

We trust that this information will be satisfactory. Should you have any questions or desire additional information, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



L. H. Heider  
Vice President  
Manager of Operations

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