

JUL 26 1985

Docket No. 50-271

Vermont Yankee Nuclear Power Corporation  
ATTN: Mr. Warren P. Murphy  
Vice President and Manager  
of Operations

RD 5, Box 169  
Ferry Road  
Brattleboro, Vermont 05301

Gentlemen:

Subject: Inspection Report No. 50-271/85-06

This refers to your letter dated May 24, 1985, in response to our letter dated April 16, 1985.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions were reviewed during an NRC Inspection 50-271/85-22 conducted on June 3-12, 1985, and found acceptable.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Lee H. Bettenhausen

*for* Stewart D. Ebnetter, Director  
Division of Reactor Safety

cc:

R. W. Capstick, Licensing Engineer  
W. F. Conway, President and Chief Executive Officer  
J. P. Pelletier, Plant Manager  
D. Hunter, Vice President  
C. Richardson, Vermont Public Interest Research Group, Inc.  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
State of New Hampshire  
State of Vermont

Region I Docket Room (with concurrences)  
DRP Section Chief

RI:DRS  
Preliminary

RI:DRS  
Johnson

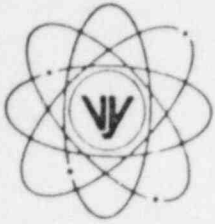
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Ebnetter

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# VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 85-50

REPLY TO

ENGINEERING OFFICE

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

May 24, 1985

U.S. Nuclear Regulatory Commission  
Office of Inspection & Enforcement  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Attention: Mr. Stewart D. Ebnetter, Director  
Division of Reactor Safety

References: a) License No. DPR-28 (Docket No. 50-271)  
b) Letter, USNRC to VYNPC, Inspection Report No. 50-271/85-06,  
dated 4/16/85

Dear Sir:

Subject: Response to I&E Inspection Report 50-271/85-06

This letter is written in response to Reference b) which indicates that some of our activities concerning corrective actions were not conducted in full compliance with Nuclear Regulatory Commission requirements. The alleged Severity Level IV violation was cited during an inspection conducted January 28 - February 1, 1985 by your Mr. J. Prell at Vermont Yankee Nuclear Power Station in Vernon, Vermont. Information is submitted in the following paragraphs in answer to the alleged Severity Level IV violation.

## FINDING

As a result of the inspection conducted on January 28-February 1, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

Criterion XVI of 10 CFR 50 Appendix B states in part "Measures shall be established to assure that conditions adverse to quality...are promptly...corrected."

Section XVI.C.1 of the Yankee Operational Quality Assurance Program I-A states in part:

"Satisfaction of this criterion (Criterion XVI of 10 CFR 50, Appendix B) shall be assured through the implementation of...actions listed below:

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- a. Initiation of corrective action following the determination of a condition adverse to quality to preclude recurrence.
- b. Follow-up reviews to verify proper implementation of corrective actions and to close out the corrective action documentation...."

Contrary to the above, as of February 1, 1985, the initiations and follow-up reviews of corrective actions following the determination of an adequate biennial plant procedure review program, by NRC in 1980 (Report No. 50-271/80-19) and by the licensee's QA audits in 1983 and 1984 (Audit Nos. 83-01, 84-01, 84-02 and 84-13), were inadequate. As a result, sixty five VYNPS procedures, identified in paragraph 3.5 of the enclosed report, remain unreviewed for periods up to seventeen months beyond their required biennial review dates.

This is a Severity Level IV violation (10 CFR 2, Appendix C, Supplement I).

## RESPONSE

We agree with the inspector's finding on this item. The number of procedures beyond their review date is and has been an ongoing concern to Vermont Yankee. Corrective actions following the 1980 NRC audit were initiated and implemented. Follow-up reviews were conducted and additional changes made to improve the process. In 1984, reviews of the status of overdue procedures identified a need for further corrective action.

During 1984, changes were made to Administrative Procedure AP 0831, Plant Procedures, to streamline the procedure review process and further enhancements to the procedure tracking system were implemented. Personnel performance goals were established to reduce the procedure backlog and maintain it at a low level. As can be seen from the attached Figure, these measures have been effective. To further enhance this process and ensure the backlog remains low, the following changes will be made immediately. The procedure changes will be implemented by September 1, 1985.

1. AP 0831 will be revised to require additional management attention for all procedures which exceed their review date. For each procedure exceeding its review date by more than 3 months, the Plant Operations Review Committee will review the situation and recommend action to the Plant Manager.

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2. AP 0831 will be revised to clearly state individuals' responsibility in meeting procedure review dates and in expediting addressing procedures beyond their review date.

Contained in the Notice of Violation are references to findings by our QA Audit Program. These findings were directed toward problems in the timely incorporation into procedures of temporary changes (Department Instructions). The procedure which controls these changes, AP 0832, Department Instructions, has been modified a number of times to streamline this process. The most recent change was in November 1984 and results show it to be effective.

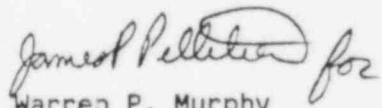
On a semi-annual basis, our QA group will conduct audits of AP 0831 and AP 0832 to ensure these changes effectively result in either no backlog or complete justification for overdue procedures. These audits will continue for at least two years.

We conclude that the corrective action committed to herein is sufficient to assure that the violation cited will not be repeated and that the safe and efficient operation of Vermont Yankee will continue.

Appendix A to Inspection Report 85-05 requires that a reply to the subject violation be submitted within 30 days of transmittal. Please note that a 10-day extension of this period has been granted by the NRC Resident Inspector.

Very truly yours,

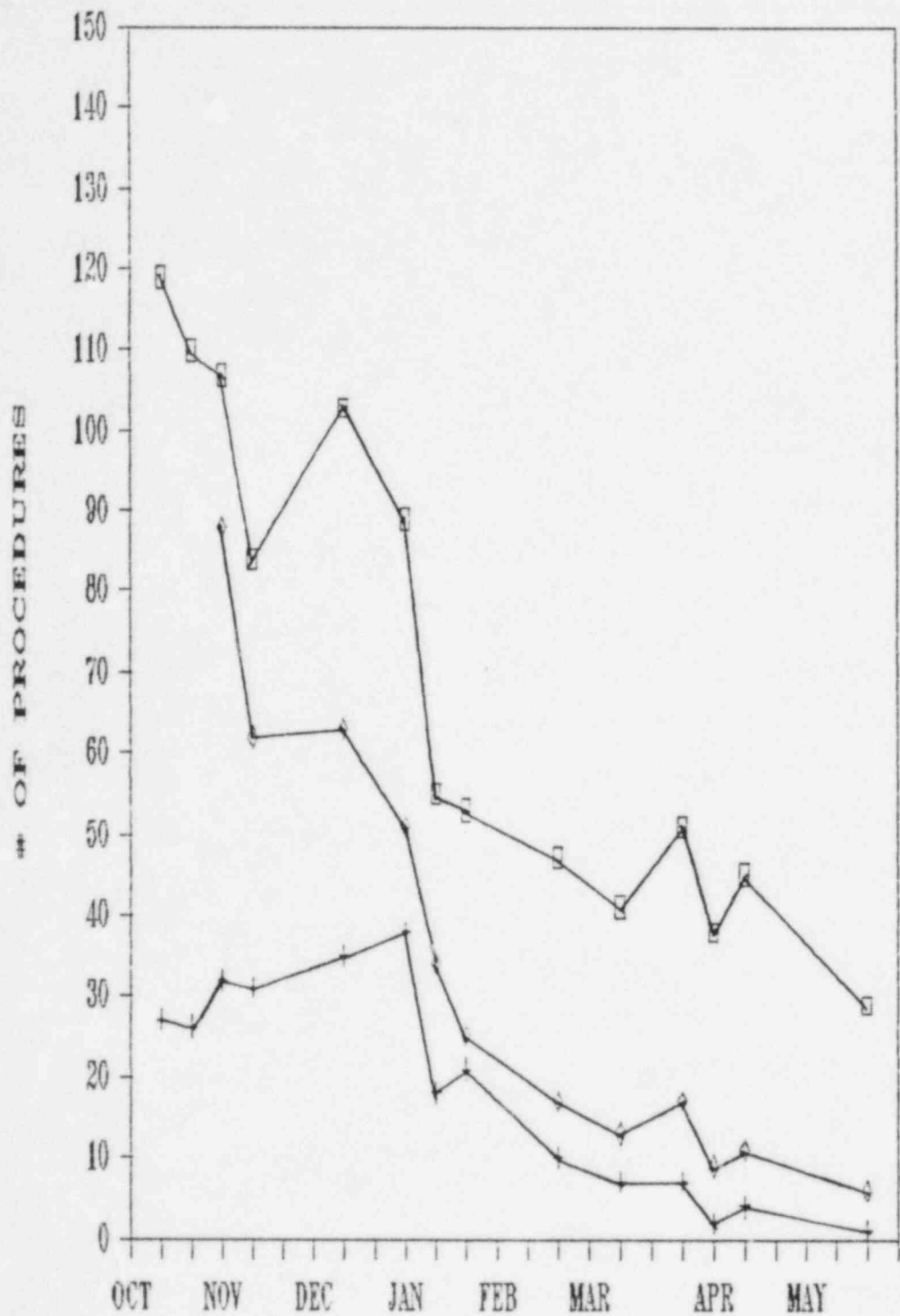
VERMONT YANKEE NUCLEAR POWER CORPORATION



Warren P. Murphy  
Vice President and  
Manager of Operations

WPM/dm

# PROCEDURES PAST REVIEW DATE



OCT 1984 - MAY 1985

□ TOTAL OVERDUE

+ >6 MON ODUE

◇ >3 MON ODUE