

# Maine Yankee

RELIABLE ELECTRICITY SINCE 1972

329 BATH ROAD • BRUNSWICK, MAINE 04011 • (207) 798-4100

November 15, 1996

MN-96-162

JRH-96-241

## UNITED STATES NUCLEAR REGULATORY COMMISSION

Attention: Document Control Desk

Washington, DC 20555

Reference: (a) License No DPR-36, Docket No. 50-309

(b) Letter: J.R. Hebert, MYAPC, to USNRC; "Reply to Notice of Violation Associated with NRC Inspection Report 50-309/96-05": dated April 29, 1996; MN-96-62

Subject: Schedule Commitment Change Regarding Full Compliance

Gentlemen:

In Reference (b) Maine Yankee indicated that full compliance with the requirements of the Motor Operated Valve (MOV) test program would be achieved by December 31, 1996. We have not been able to proceed with our stated corrective steps as expeditiously as we anticipated, primarily due to the impact to the company to support the Independent Safety Assessment. We now believe full compliance will not be achieved in accordance with that schedule.

Several of the corrective actions discussed in Reference (b) have been completed or are underway. The root cause evaluations have been completed. Methodology clarification and additional procedural development is underway and will be completed in January of 1997. An initial top to bottom review of the program has been completed. Results of this review will be used to validate newly instituted procedural measures. Supplemental reviews will occur every other month until the program is ready for closure.

In addition, since the inspection, Maine Yankee has appointed a new full time MOV coordinator and contracted four full time and one part time contractor to assist with program closure. Furthermore, Maine Yankee has contracted revision of its program valve weak link calculations, which are about 50% completed.

The update of the MOV design basis Technical Evaluations, a commitment resulting from Maine Yankee's last closure inspection, is scheduled to begin after the Governing Test Acceptance Criteria Process is complete. Initiation of this task, which is the critical path for closure, was delayed approximately 5 months due to ISA and emergent work. This effort is labor intensive and is now recognized as the major schedule constraint.

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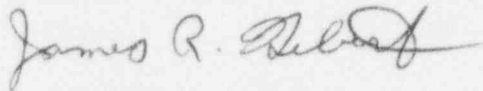
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In addition to the previously scheduled closure related work, Maine Yankee anticipates the addition of several valves to the MOV program due to plant modifications and our design basis recovery efforts. As new safety functions for these valves are identified, performance of procedure 17-230, Engineering Design Discrepancy Evaluation, will be accomplished as justification for continued operation, as required. In order to settle the design basis issues associated with these valves, and to perform the required testing and analyses, we now believe full compliance will not be achieved until 90 days after Maine Yankee's next refueling outage.

Very truly yours,



James R. Hebert, Manager  
Licensing & Engineering Support Department

JRH/mwf

Enclosure

c: Mr. Hubert Miller  
Mr. J. T. Yerokun  
Mr. Daniel H. Dormer  
Mr. Patrick J. Dostie  
Mr. Uldis Vanags