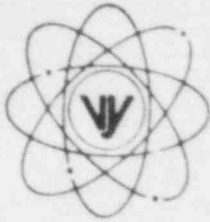


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 85-77

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-8100

August 20, 1985

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

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

References: a) License No. DPR-28 (Docket No. 50-271)
b) Letter, USNRC to VYNPC, dated 7/26/85 and Inspection
Report No. 85-22, Appendix A (Notice of Violation)

Dear Sir:

Subject: Response to Inspection Report No. 85-22

This letter is written in response to Reference b), which indicates that one of our activities was not conducted in full compliance with Nuclear Regulatory Commission requirements. This alleged Level V violation was identified as a result of an inspection conducted by your Mr. J. Johnson during the period of June 3-12, 1985.

Information is submitted as follows in answer to the alleged violation contained in the Appendix to your letter.

ITEM: 10 CFR, Appendix B, Criterion IV, requires measures to assure that requirements necessary to assure adequate quality are included in procurement documents. Criterion VIII further requires measures to control parts and components to prevent the use of incorrect or defective material.

Section IV of the Yankee Operational Quality Assurance Manual, YOQAP-1-A, Rev. 15, and Sections VII and VIII of YAEC Operating Guideline No. 1, Rev. 7, require traceability of the identification of parts to drawings, specifications, purchase orders and documented verification prior to release for use. Small spare parts with no traceability (as specified in Appendix C to YOQAP-1-A) must be qualified for use. Procedure AP 0800, Rev. 11, specifies that material requiring quality assurance be ordered with Appendix A, "Quality Assurance Requirements" included. Procedure AP 0310, Rev. 0, alternatively specifies that if off-the-shelf parts are used rather than traceable parts, a 100 hour burn-in period is required for qualification testing.

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Contrary to the above, as of June 10, 1985, two parts designated as safety related on the Safety Related Class IE Instrument List were purchased and installed without having Appendix A to AP 0800, "Quality Assurance Requirements" included in the procurement documents, nor documented verification of traceability of the parts, nor alternative qualification testing performed prior to return to service. These parts had minimal safety significance.

RESPONSE:

On February 6, 1985, a non-safety related switch was issued erroneously to a safety related MR (85-256) on Material Issue Slip #02A0042. The part was correctly labeled with a non-safety related tag. The Material Issue Slip was incorrectly written leading to the issuance of a component of the wrong classification. It was determined that the switch is acceptable "as is" since the new switch was verified to be identical to the switch that was replaced and that the newly installed switch has been subjected to a 100 hour operational test and a satisfactory resistance check.

On June 12, 1985, a Non-Conformance Report was generated in order to evaluate and disposition a MSIV coil replacement accomplished by a safety-related MR (85-986). The part was correctly labeled with a non-safety related tag, however, at the time of issuance the Stores Clerk failed to recognize that the material was identified (tagged) as non-safety related. The part was issued as documented by Material Issue Slip #05A0137 and was the component requested by part number and description. It was determined that the coil is acceptable "as is" since the new coil was verified to be identical to the coil that was replaced and that the newly installed coil has been subjected to a 100 hour operational test (measured coil voltage and verification of energized coil), which provides the required qualification in accordance with our quality assurance manual (VYQAP-1A).

Because of these events, a step was added to the Issuing and Returning of Parts, Materials, and Components procedure, AP 0806, which states that the Stores Clerk, when issuing safety-related materials will verify that the item is properly identified and marked with a "P" tag in accordance with AP 0802, "Identification and Control of Materials, Parts and Components". This will ensure safety-related materials are being issued for safety-related applications. It should be noted that the above types of parts are referenced under the QA Topical Report YQAP-1-A, Appendix C, page 8, paragraph V.2, as acceptable for use in safety class systems after being qualified.

In addition to the corrective actions detailed above, Procedure AP 0806 was revised and issued on July 30, 1985 to incorporate a checkoff box ☐ on the Material Issue and Material Return form indicating that the materials being requested are applicable to either safety or non-safety work efforts.

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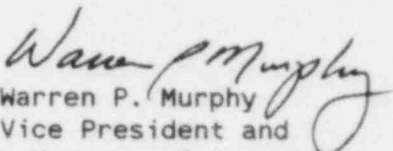
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Additionally, Stores personnel have been instructed to issue only safety-related materials for safety-related work efforts, unless an approved Non-Conformance Report is generated.

We consider the above actions adequate to prevent recurrence of this event and to achieve full compliance.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations

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