



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

362 INJUN HOLLOW ROAD • EAST HAMPTON, CT 06424-3099

February 25, 1997

Docket No. 50-213

B16259

Re: 10 CFR 2.201

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

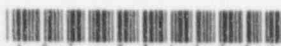
Haddam Neck Plant  
Reply to Notice of Violation  
NRC Inspection Report No. 50-213/96-13

In a letter dated February 4, 1997 <sup>(1)</sup> the NRC transmitted to Connecticut Yankee Atomic Power Company (CYAPCO) the report documenting inspections conducted at the Haddam Neck Plant (HNP) from November 16, 1996 through January 5, 1997. As discussed in the report, the NRC Staff cited CYAPCO for a violation of Technical Specification 6.8.1 for procedural non-compliance during the preparations to test emergency diesel generator EG-2B on November 27, 1996. This is a Severity Level IV violation (Supplement 1).

The NRC Staff requested that CYAPCO respond to the notice of violation (NOV) within 30 days of the date of the letter. Pursuant to the provisions of 10 CFR 2.201, Attachment 1 hereby provides CYAPCO's response to the subject NOV.

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<sup>(1)</sup> J. F. Rogge to T. C. Feigenbaum, "NRC Integrated Inspection Report 50-213/96-13", dated February 4, 1997.



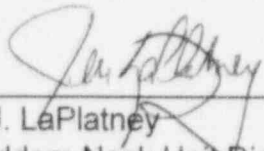
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If you should have any questions on the information contained herein, please contact Mr. G. P. van Noordennen at (860) 267-3938.

Very truly yours,  
CONNECTICUT YANKEE ATOMIC POWER COMPANY

FOR: T. C. Feigenbaum  
Executive Vice President and  
Chief Nuclear Officer

BY:

  
\_\_\_\_\_  
J. J. LaPlatney  
Haddam Neck Unit Director

Attachments (1)

cc: H. J. Miller, Region I Administrator  
M. B. Fairtile, NRC Project Manager, Haddam Neck Plant  
W. J. Raymond, Senior Resident Inspector, Haddam Neck Plant

Docket No. 50-213  
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Attachment 1

Haddam Neck Plant

Reply to Notice of Violation  
NRC Inspection Report 50-213/96-13

February 1997

Attachment 1  
Haddam Neck Plant  
Reply to Notice of Violation  
NRC Inspection Report No. 96-13

**Restatement of Violation**

During NRC inspections conducted from November 16, 1996 through January 5, 1997, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (Enforcement Policy), NUREG 1600, the violations are listed below:

Technical Specification 6.8.1, requires, in part, that written procedures shall be established, implemented, and maintained covering activities as recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33 requires procedures to provide instructions for maintenance and testing the emergency power systems. Preventive Maintenance Procedure (PMP) 9.1-31, Diesel In-leakage and Fuel Oil Transfer Pump Availability, Revision 11, dated January 23, 1996 was prepared pursuant to the above, and in Step 6.2.10 required the operator to remove the "B" emergency diesel generator (EG-2B) crank over tool and to place it in its storage rack.

Contrary to the above, on November 27, 1996, during preparations to test EG-2B after jacking the engine, the operator failed to remove the crank over tool per step 6.2.10 prior to running the diesel for the one hour operability test.

This is a Severity Level IV violation (Supplement I).

**Reason for the Violation**

The reason for the violation is personnel error on the part of the operator. The operator interrupted performance of the procedure to replace a defective extension cord. He had inappropriately initialed completion of the step to remove the tool prior to performing the task. When he returned to the procedure, he continued beyond the step which required removal of the tool.

Procedure usage has been a concern in recent months. The nitrogen bubble event in September, 1996 revealed problems with the number, quality and use of procedures at the HNP. As a result of lessons learned from that event, the Operations Department took wide and varied corrective actions on the use of procedures. These included writing procedures for tasks which previously did not have procedures, improved

expectations for pre-job briefings, and personal accountability for performance of procedures.

CYAPCO has reviewed this event, particularly in light of past corrective actions, and determined that this violation resulted from the performance of one individual. The procedure was adequate and expectations were clear. The operator failed to meet those expectations.

#### **Corrective Steps Taken and Results Achieved**

The operator was temporarily removed from licensed operator duties. The Operations Manager reinforced expectations for procedure rules of usage to the operator. The operator then personally conveyed the lessons learned from this experience, and his ownership of his mistake to the Operations Department. The results achieved are that this operator has learned a valuable lesson, the other operators have learned from his experience and management expectations have been reinforced.

#### **Corrective Steps to Prevent Future Violations**

This event is attributed to an individual case of human error. No additional corrective actions will be taken.

#### **Date When Full Compliance Will be Achieved**

Full compliance was achieved on November 27, 1996 with the successful completion of the surveillance for EG-2B.