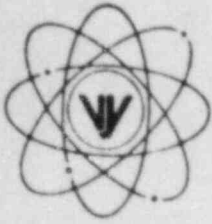


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 86-10

REPLY TO:

ENGINEERING OFFICE

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

February 5, 1986

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

Attn: Edward C. Wenzinger, Chief
Project Branch No. 3
Division of Reactor Projects

References: a) License No. DPR-28 (Docket No. 50-271)
b) Letter, USNRC to VYNPC, NPY 86-03, dated 1/13/86

Dear Sir:

Subject: Response to Inspection Report 85-36 Notice of Violation

This letter is written in response to Reference b), which indicates that one of our activities was not conducted in full compliance with NRC requirements. This alleged violation was identified as a result of the inspection conducted by the resident NRC inspector on October 21-November 25, 1985, and has been categorized as a Severity Level V violation.

Notice of Violation

"Technical Specification (TS) 6.5.A requires that detailed written surveillance procedures be prepared, approved and followed. Procedure OP 4511 was written pursuant to the above and requires test personnel to expose the Refuel Floor Area Radiation Monitors (ARMs) to a radiation source of sufficient strength to activate the channel trip setpoint, and further, to note and record trip settings during the quarterly calibration.

Contrary to the above, during quarterly calibrations on July 26 and October 28, 1985, the East and West Refuel Floor ARMs were not exposed to a radiation field of sufficient intensity to activate the channel trip setpoints. Further, supervisory personnel who approved the completed tests failed to detect the discrepant test results and initiate corrective actions.

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This is a Severity Level V Violation (Supplement I.E.)."

RESPONSE

The technician failed to follow the calibration procedure in that he did not note the actual alarm setpoints as required by the "Source Calibration of Process Radiation Monitoring System" procedure (OP 4511). The calibration data sheet (VYOPF 4511.08) was deficient in that it lacked provision for recording this required information. Detection of the technician's error by supervisory personnel was impeded by the inadequacy of the data sheet.

The alarm setpoints noted in OP 4511 were lower than the actual alarm setpoints established by OP 4326. The calibrator referenced in the procedure, although strong enough to reach the setting specified in OP 4511, was not sufficient to reach the actual alarm setpoints.

CORRECTIVE ACTIONS

Immediately following the discovery of this discrepancy, a source of sufficient strength was used to verify the actual alarm setpoints of the Refueling Floor monitors. Additionally, an evaluation was performed to determine whether any other area radiation monitors had been inadequately calibrated. None were found.

ACTIONS TAKEN TO AVOID FURTHER VIOLATIONS

As a corrective action, Department Instruction 86-03 to OP 4511 was issued on January 15, 1986 to modify VYOPF 4511.08 to provide for inclusion of the required information. Additionally, the circumstances of the violation were discussed with the Chemistry and Health Physics staff on December 20, 1985 at their weekly department meeting.

In early December 1985, a replacement calibrator (traceable to the National Bureau of Standards) was received for use in area radiation monitor calibration.

Presently, OP 4511 is under review to determine necessary changes to improve overall consistency and clarity. It is anticipated that the revised procedure will be issued prior to startup from our present outage.

In summary, we believe the above corrective actions to be sufficient to avoid any further violations.

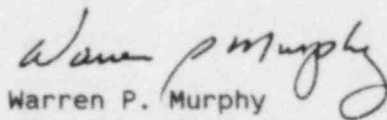
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We trust that the information provided above is acceptable; however, should you have any questions or desire additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

A handwritten signature in dark ink, appearing to read "Warren P. Murphy", is written over the typed name.

Warren P. Murphy
Vice President and
Manager of Operations

/dm