

June 19, 1997

Mr. Donald A. Reid  
Vice President, Operations  
Vermont Yankee Nuclear Power Corporation  
RR 5, Box 169  
Ferry Road  
Brattleboro, VT 05301

Subject: NRC INSPECTION REPORT NO. 50-271/97-02 - REPLY

Dear Mr. Reid:

This refers to the May 9, 1997 correspondence, in response to our letter dated April 9, 1997, regarding Vermont Yankee. This correspondence dealt with Notice of Violation 50-271/97-02-04.

Thank you for informing us of your corrective actions. We have reviewed this matter in accordance with NRC Inspection Manual Procedure 92902, "Followup - Maintenance." We agree with your assessment of the root and contributing causes for the failure to properly anticipate the impact of de-energizing 480V electrical bus No. 6. The corrective actions you have taken or have proposed for the cited violation appear to have appropriately bound the specific deficiencies. These corrective actions will be examined during a future inspection to assess their overall effectiveness.

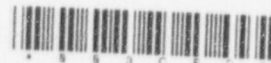
Your cooperation with us is appreciated.

Sincerely,

ORIGINAL SIGNED BY:  
ROBERT J SUMMERS FOR:

Curtis J. Cowgill, III, Chief  
Projects Branch No. 5  
Division of Reactor Projects

Docket No. 50-271



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G PDR

Mr. Donald A. Reid

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cc:

R. McCullough, Operating Experience Coordinator - Vermont Yankee  
R. Wanczyk, Director, Safety and Regulatory Affairs  
G. Maret, Plant Manager  
J. Duffy, Licensing Engineer, Vermont Yankee Nuclear Power Corporation

cc w/ cy of Licensee Response Letter:

J. Gilroy, Director, Vermont Public Interest Research Group, Inc.  
D. Tefft, Administrator, Bureau of Radiological Health, State of New Hampshire  
Chief, Safety Unit, Office of the Attorney General, Commonwealth of  
Massachusetts  
R. Gad, Esquire  
G. Bisbee, Esquire  
T. Rapone, Massachusetts Executive Office of Public Safety  
State of New Hampshire, SLO Designee  
State of Vermont, SLO Designee  
Commonwealth of Massachusetts, SLO Designee

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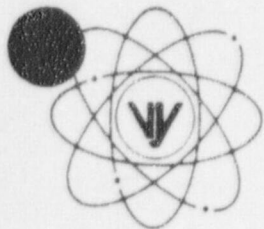
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# VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO  
ENGINEERING OFFICE

580 MAIN STREET  
BOLTON, MA 01740  
(508) 779-6711

May 9, 1997  
BVY 97-61

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

References: (a) License No. DPR-28 (Docket No. 50-271)  
(b) Letter, USNRC to VYNPC, NRC Inspection Report 97-02,  
NVY 97-47, dated 4/9/97

Subject: Reply to a Notice of Violation - Inspection Report No. 97-02

This letter is written in response to Reference (b), which documents that our activities were not in full compliance with NRC requirements. This violation was identified during an inspection conducted from January 19 to March 8, 1997. Our response to the violation is provided below.

## VIOLATION

Technical Specification 6.5, "Plant Operating Procedures", states that detailed written procedures involving both nuclear and non-nuclear safety operations shall be prepared, approved, and adhered to. Vermont Yankee Administrative Procedure (AP)-0125, "Plant Equipment Control", Appendix B, "Conditions Required to Remove Non-Technical Specifications Required Equipment from Service," Revision 7, dated October 31, 1995, requires that prior to a planned evolution which will remove from service or otherwise make inoperable any power supply, the shift supervisor will ensure that a detailed review of loads impacted by the de-energization of the power supply is completed.

Contrary to the above, on November 25, 1996, while the reactor was operating at 100 percent power, the shift supervisor did not ensure that a detailed review of loads impacted by the de-energization of 480V electrical bus No. 6 for planned preventative maintenance was conducted prior to its de-energization, resulting in the unanticipated automatic isolation of the in-service condensate demineralizers and the opening of the associated bypass valve.

This is a Severity Level IV violation.

## RESPONSE

### 1) Reason for the violation

Vermont Yankee does not contest this violation. The root cause of this occurrence was personnel error. A contributing cause was over-reliance on an uncontrolled sequence of events guideline. In addition, programmatic weaknesses in planning the on-line de-energization by the Operations and Work Control departments also contributed to the event.

### 2) Corrective steps that have been taken and the results achieved

Event Report 96-1131 was initiated and documented the detailed root cause

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investigation. Expectations for any future equipment de-energizations have been communicated to Shift Supervisors and the Operations Planning Coordinator by the Operations Manager. Changes have been made to the administrative procedure AP-0125, Plant Equipment Control, used by Operations personnel to control removal of equipment from service to ensure proper reviews are completed. These procedure changes and expectations for any future equipment de-energizations have also been provided to all operating personnel via Operations Night Orders.

3) Corrective steps that will be taken to avoid future violations

Procedures used by the Operations and Work Control departments to plan maintenance activities where equipment must be de-energized are being revised to further enhance the process. The revisions to these procedures will:

- a) Provide more specific guidance and expectations for ensuring that sufficient consideration is given to the effect of maintenance work on overall operation of the plant (particularly for bus or power supply de-energizations).
- b) Ensure that personnel can verify that the necessary reviews have been completed prior to on-shift operators authorizing equipment release.

Lessons learned from this event are being incorporated into the Operations Training program and will be addressed with all Operations personnel in greater detail as part of Training Cycle 19.6.

These additional corrective actions to enhance the process, as listed above, will be completed by August 1997.

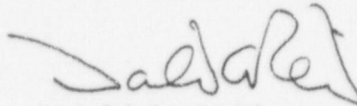
4) Date when full compliance will be achieved

Full compliance was achieved when the Operations Manager reinforced expectations for the removal of equipment from service with the Shift Supervisors and a procedure revision was made and issued on March 28, 1997 to Operations Department Administrative Procedure AP-0125.

We trust that the information provided is fully responsive to your concerns; however, should you have additional questions or require additional information, please contact this office.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Donald A. Reid  
Vice President, Operations

cc USNRC Region 1 Administrator  
USNRC Project Manager - VYNPS  
USNRC Resident Inspector - VYNPS