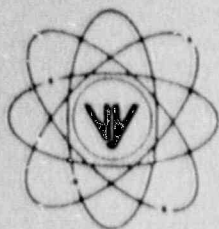


# VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

BVY-90-012

APPLY TO  
ENGINEERING OFFICE  
580 MAIN STREET  
BOLTON, MA 01740  
(508) 779-6711

February 5, 1990

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

- References:
- a) License No. DPR-28 (Docket No. 50-271)
  - b) Letter, USNRC to VYNPC, NVY 90-004, Systematic Assessment of Licensee Performance (SALP) Report, No. 50-271/88-99, dated 1/8/90
  - c) Letter, USNRC to VYNPC, NVY 90-005, Licensed Operator Replacement Examinations, Requalification Program Evaluation, and BWR Power Oscillation Inspection, Combined Report No. 50-271/89-18 (OL), dated 1/5/90

Dear Sir:

Subject: Vermont Yankee Response to SALP Report No. 50-271/88-99

We appreciated the opportunity to discuss the subject report with you on January 31, 1990, during the public meeting held in Vernon, Vermont. In general, we believe that the report is a fair appraisal of our performance during the period from July 1, 1988 through September 30, 1989. The following is submitted to either describe current initiatives that are intended to address the noted weaknesses or minor clarifications in reporting discrepancies.

## SUMMARY OF RESULTS

### SECTION II. INTERVIEW

#### o Page 2, Paragraph 4

As reported in our response to Inspection Report 89-80, Vermont Yankee has completed the initial process of formalizing our current maintenance practices. As part of our ongoing efforts to further enhance the Maintenance Program, a plan is being developed to provide further improvements. We would be pleased to schedule a presentation and discussion of our plans with you later this year.

In addition, Vermont Yankee is closely following the "Industry Action Plan for Continued Improvement of Nuclear Power Plants." Efforts are in progress to integrate these action items with the others in order to provide a formal program of maintenance practices and philosophies that will last through the life of the plant.

9002220179 900205  
PDR ADOCK 05000271  
Q PNU

TE40  
1/0

U.S. Nuclear Regulatory Commission  
February 5, 1990  
Page 2

In response to an in-house audit by our quality assurance organization in the area of corrective action, Vermont Yankee initiated a task force effort that is charged with reviewing the corrective action processes used throughout this organization, with the aim of formalizing and improving the effectiveness of a common system. The recommendations from that task force are currently in review. It is anticipated that the resulting actions will provide a major improvement to our overall corrective action process.

Vermont Yankee will re-evaluate the current process for reviewing and revising plant procedures in light of the incidents that occurred apparently due to certain procedural deficiencies. We are confident that the result of that effort will address the NRC concerns in this area.

As further evidence that we are committed to enhancing our routine processes into appropriate formalized programs, we have recently developed and implemented a "Fuel Performance Monitoring Guidelines and Failed Fuel Action Plan." This plan provides, among other things, approved guidance and actions for the plant staff should offgas and other indicators reach pre-determined threshold limits.

#### PERFORMANCE ANALYSIS

##### SECTION III.A - PLANT OPERATIONS

o Page 5, Paragraph 2

Additional efforts to improve the routine performance of certain activities will be implemented during the next outage. These include an improved and simplified method for tagging which adds the ability to establish system "umbrella tags." Also, the role of the operations work planning group will be expanded to include coordinating the new umbrella tags, monitoring system work efforts as well as closely coordinating the outage activities through the transitional phases.

o Page 5, Paragraph 4

As documented in Reference c), during your November 1989 review of Vermont Yankee's operator training program, 3 of 3 senior reactor license upgrade candidates successfully completed the NRC examination. Further, 12 of 12 licensed operators satisfactorily completed the NRC examination that determined that Vermont Yankee has implemented an effective operator requalification program. With these results, as well as those indicated in the SALP Report, we believe that our operator training program is extremely effective.

It should be noted that the following additional initiatives are currently in progress at Vermont Yankee.

U.S. Nuclear Regulatory Commission  
 February 5, 1990  
 Page 3

- o The Emergency Operating Procedures (EOP's) are being upgraded to reflect the latest guidance of EPG Rev. 4. The operators will be trained and the procedures implemented by this summer.
- o The effort to implement an emergency response facility information system (ERFIS) is nearing completion. We are currently in the final phases of startup testing; plans are to declare the system operable this summer in conjunction with the EOP upgrade.
- o A recent initiative to facilitate the dialogue of new plant issues with the appropriate first line supervisory personnel was established this past fall. This daily discussion of plant issues occurs during the first part of each working day and includes the establishment of priorities by Operations personnel with the Maintenance foremen in order to establish the day's work plan.

### SECTION III.B - RADIOLOGICAL CONTROLS

#### Radiation Protection

- o Page 8, Paragraph 6

Although the "deficiency" with the breathing zone air sampling equipment was never identified in any previous inspection report, we believe the inspector's concern was immediately resolved. It should be noted that similar vortex separators had been used at Vermont Yankee since 1972 with no identified problems. Their use in this application was accepted by appropriate organizations, including the National Institute of Occupational Safety and Health (NIOSH).

- o Page 9, Paragraph 2

The issue of locked radiation doors was readdressed in response to NRC Inspection Report No. 89-17. This response indicated that we would insure that responsibilities were well defined and the appropriate plant staff personnel were aware of their accountability. We also committed to clarify the criteria for maintaining certain doors locked via procedural changes as well as to improve our preventive maintenance practices of those doors. We feel that these actions are appropriate and will enhance our ability to maintain the doors locked while at the same time will not inhibit employee access to plant areas nor create a situation that could jeopardize personnel safety.

#### Radioactive Waste Management

- o Page 9, Paragraph 4

Contrary to the implications contained in the SALP Report, Vermont Yankee acted on the Information Notice more expeditiously than through the normal

U.S. Nuclear Regulatory Commission  
February 5, 1990  
Page 4

process. The Notice was received coincidentally with a concern over the heavy metal content of Vermont Yankee sludge that was deposited on a Vernon farm. Vermont Yankee and the State of Vermont cooperated during the entire process in analyzing and evaluating all of the effects of the septage disposal.

o Page 10, Paragraph 1

It should be noted that Vermont Yankee has not discharged any liquid radioactive effluents since December 1981.

It should be noted that the following additional initiatives are currently in progress at Vermont Yankee:

- o Continuing efforts are in progress to strengthen the management and organization in the Radiation Protection Department by providing clearer and specific definition of their assigned tasks. The Health Physics checkpoint underwent extensive modifications this past year in a successful attempt to improve both traffic flow and personnel monitoring. Also, equipment is being purchased for installation this year to facilitate trash and tool frisking and at the same time improve worker productivity and frisking consistency.
- o Improved flooring which is non-porous and easier to keep clean is being installed in a number of areas susceptible to contamination. This should significantly reduce the presence of low level radioactive contamination.

SECTION III.C, MAINTENANCE/SURVEILLANCE

o Page 13, Paragraph 1

Vermont Yankee agrees that certain plant equipment is functioning at below our own expectations for system performance. The Uninterruptible Power Supply (UPS) will be replaced with rotating units during the 1990 refueling outage. Extensive efforts have already been expended in an attempt to identify and correct the problems of the Toxic Gas Monitoring System. These have resulted in a more than 50% reduction in corrective maintenance. During 1990, we plan to further assess the recurring Reactor Water Cleanup (RWCU) pump seal problems, as well as the Toxic Gas Monitor with the goal of identifying a longer term solution.

o Page 13, Paragraph 3

Our effort to review and update all the remaining Safety Class Vendor Manuals is planned to be completed during 1990.

U.S. Nuclear Regulatory Commission  
February 5, 1990  
Page 5

o Page 14, Paragraph 1

It should be noted that Vermont Yankee has not experienced one short notice outage since July 1988. At all times, however, we do maintain a listing of priority work efforts, including all related work package information and documentation so that work could proceed expeditiously should the opportunity arise.

o Page 14, Paragraph 3

As discussed earlier, a formal maintenance program has been approved and issued. In late 1989, we began development of a computer based Maintenance Material Management System which will allow maintenance personnel to rapidly access equipment data, review past equipment history, and more efficiently schedule maintenance activities.

SECTION III.D, EMERGENCY PREPAREDNESS

It should be noted that the 1988 emergency exercise scenario was designed to be interactive. Many mock-ups were used throughout the plant to simulate as realistic an effort as possible to mitigate the effects of the "plant event" during real time. Based on the universal success with that method, future emergency drills will continue to utilize "actual repairs" to the extent possible.

SECTION III.E, SECURITY

As described in our written response to the potential violations noted in NRC Inspection Report No. 89-08, and discussed at the meeting in King of Prussia on September 6, 1989, we are currently in the process of upgrading certain aspects of our security program. We are awaiting the NRC response to our view of the security situation so that any further improvements needed can be expeditiously identified and resolved.

o Page 18, Paragraph 3

Relative to the thoroughness of the QA audit in the security area, we have completed our evaluation of the audit process and have concluded that certain improvements can be made. The major improvement is that the auditors will now place greater emphasis on their review of the security program against the Code of Federal Regulations in lieu of our security plan. This will more closely complement the NRC inspections. In addition, increased use of performance based techniques will be used as appropriate.

A QA security audit was recently completed using three technical specialists from other utilities. This audit was conducted using performance based techniques including walkdowns, interviews, and observations of security force work activities. In addition, several security alarms were initiated by the audit team in order to observe the effectiveness of the security response.

U.S. Nuclear Regulatory Commission  
February 5, 1990  
Page 6

We believe that both Vermont Yankee and the NRC would benefit from more open communications and clear, up front understanding of expectations in the security area.

SECTION III.F, ENGINEERING/TECHNICAL SUPPORT

o Page 21, Paragraph 3

The entire design basis/configuration management efforts are currently planned to be reviewed during this year. Following that review we will develop an action plan to address any necessary changes. When this effort is completed, we will contact you so that we may present the results of this evaluation to NRC management.

o Page 22, Paragraph 6

The scope and content of justification for continued operation (JCO's) as an assessment tool is a relatively new issue. We heartily support the JCO concept and our efforts to use it in an effective manner have improved with experience and use. In an effort to insure future consistency of JCO applicability, content, review, and timing, Vermont Yankee is considering the development of written guidelines for use this year.

o Page 23, Paragraph 2

As committed in our March 16, 1989 letter that addressed management overview of our Fire Protection program, Vermont Yankee committed to an independent evaluation that focused specifically on management oversight. In December 1989, the evaluation was completed. Although we have not yet received the final report, the evaluators did indicate that Vermont Yankee maintains a very effective program consistent with good fire protection practice and regulatory criteria. Some concerns were expressed in the areas of long-term program effectiveness, program training, and staffing. Resolution of these items will occur on a schedule consistent with receipt of the final report.

Also in the area of fire protection, we have completed a significant procedure change which results in delegating the authorities for the specific fire related surveillances to the individual responsible department. This effort should result in increased awareness of each department's responsibility as well as allow more time for the plant Fire Protection Coordinator to assume an oversight role. Additionally, increased training is planned for the licensed operators that is intended to improve the in-depth understanding of system design parameters. Various hardware changes to fire-related systems is in progress and/or planned for the next refueling outage.

U.S. Nuclear Regulatory Commission  
February 5, 1990  
Page 7

SECTION III.G, SAFETY ASSESSMENT/QUALITY VERIFICATION

o Page 26, Paragaraph 4

We strongly support the use of technical specialists as a part of each audit team and insist upon their use for audits of Vermont Yankee activities. Additionally, we supply our own technical experts to help perform audits at other nuclear power plants. This has the dual benefit of producing the most effective audit results as well as exposing our employees to the positive aspect of technical programs being used by others.

o Page 27, Paragraph 3

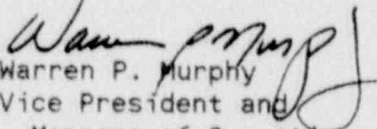
The enhancements planned for the corrective action program were discussed earlier. As part of this effort, root cause training will be completed by the end of the first quarter of 1990 for essentially all the supervisory personnel.

Vermont Yankee has requested the off-site Nuclear Safety and Audit Review Committee (NSARC) to perform a mid-cycle assessment in the same areas described for the SALP process. We would like to meet with you this summer to discuss the results of this assessment as well as other improvement initiatives.

We hope that our comments will be useful in your efforts to finalize the SALP Report; however, should you have questions or desire additional information, please do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

  
Warren P. Murphy  
Vice President and  
Manager of Operations

/dm

r : USNRC Regional Administrator, Region I  
USNRC Resident Inspector, VYNPS  
USNRC Project Manager, VYNPS