Mr. Jay K. Thayer Site Vice President Entergy Nuclear Operations, Inc. Vermont Yankee Nuclear Power Station P.O. Box 0500 185 Old Ferry Road Brattleboro, VT 05302-0500

SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION - NRC INTEGRATED

INSPECTION REPORT 05000271/2005003

Dear Mr. Thayer:

On June 30, 2005, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Vermont Yankee Nuclear Power Station (VY). The enclosed report documents the inspection findings which were discussed on July 11, 2005, with members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. Based on the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/

Clifford J. Anderson, Chief Projects Branch 5 Division of Reactor Projects

Docket No. 50-271 License No. DPR-28

Enclosure: Inspection Report 05000271/2005003

w/Attachment: Supplemental Information

cc w/encl:

- M. R. Kansler, President, Entergy Nuclear Operations, Inc.
- G. J. Taylor, Chief Executive Officer, Entergy Operations
- J. T. Herron, Senior Vice President and Chief Operating Officer
- C. Schwarz, Vice-President, Operations Support
- O. Limpias, Vice President, Engineering
- J. M. DeVincentis, Manager, Licensing, Vermont Yankee Nuclear Power Station Operating Experience Coordinator, Vermont Yankee Nuclear Power Station
- J. F. McCann, Director, Licensing
- C. D. Faison, Manager, Licensing
- M. J. Colomb, Director of Oversight, Entergy Nuclear Operations, Inc.
- T. C. McCullough, Assistant General Counsel, Entergy Nuclear Operations, Inc.
- J. H. Sniezek, PWR SRC Consultant
- M. D. Lyster, PWR SRC Consultant
- S. Lousteau, Treasury Department, Entergy Services, Inc.

Administrator, Bureau of Radiological Health, State of New Hampshire

Chief, Safety Unit, Office of the Attorney General, Commonwealth of Mass.

- J. E. Silberg, Pillsbury, Winthrop, Shaw, Pittman LLP
- G. D. Bisbee, Esquire, Deputy Attorney General, Environmental Protection Bureau
- J. Block, Esquire
- J. P. Matteau, Executive Director, Windham Regional Commission
- M. Daley, New England Coalition on Nuclear Pollution, Inc. (NECNP)
- D. Katz, Citizens Awareness Network (CAN)
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U.S. NUCLEAR REGULATORY COMMISSION REGION I

Docket No. 50-271

Licensee No. DPR-28

Report No. 05000271/2005003

Licensee: Entergy Nuclear Operations, Inc.

Facility: Vermont Yankee Nuclear Power Station

Location: 320 Governor Hunt Road

Vernon, Vermont 05354-9766

Dates: April 1, 2005 - June 30, 2005

Inspectors: David L. Pelton, VY Senior Resident Inspector

Beth E. Sienel, VY Resident Inspector James D. Noggle, Senior Health Physicist

Steven W. Shaffer, Seabrook Resident Inspector

Approved by: Clifford J. Anderson, Chief

Projects Branch 5

Division of Reactor Projects

CONTENTS

SUMMARY O	F FINDINGS	iii
REACTOR SA	AFETY	1
	Adverse Weather Protection	
	Equipment Alignment	
	Fire Protection	
1R06	Flood Protection Measures	
1R11	Licensed Operator Regualification	
1R12	Maintenance Effectiveness	
1R13	Maintenance Risk Assessment and Emergent Work Evaluation	4
1R14	Personnel Performance During Non-routine Plant Evolutions	5
1R15	Operability Evaluations	
1R19	Post Maintenance Testing	
	Surveillance Testing	
	Temporary Plant Modifications	
1EP6	Drill Evaluation	8
DADIATION C		0
	GARAGE and Liquid Effluents	
2231	Gaseous and Liquid Effluents	0
OTHER ACTIV	VITIES	9
40A2	Identification and Resolution of Problems	9
	Other Activities	
	Meetings, Including Exit	
	3-7 3-7 3	
SUPPLEMEN	TAL INFORMATION	-1
KEY POINTS	OF CONTACT A	-1
LIST OF ITEM	IS OPENED, CLOSED, AND DISCUSSED	-1
LIOT OF BOO	LIMENTO DEVIEWED	,
LIST OF DOC	UMENTS REVIEWED A	-1
LIST OF ACD		2
LIST OF ACK	ONYMS	-0

ii Enclosure

SUMMARY OF FINDINGS

IR 05000271/2005003; 04/01/05 - 06/30/05; Vermont Yankee Nuclear Power Station; Routine Integrated Report.

This report covered a 13-week period of inspection by resident inspectors and a regional senior health physicist. No findings of significance were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A. NRC-Identified and Self-Revealing Findings

No findings of significance were identified.

B. <u>Licensee-Identified Findings</u>

None.

iii Enclosure

REPORT DETAILS

Summary of Plant Status

Vermont Yankee Nuclear Power Station began the inspection period operating at or near full power. On April 25, 2005, operators reduced reactor power to approximately 80% at the request of the electrical grid operator. Power was restored to approximately 100% later that day and, with the exception of power reductions for control rod pattern adjustments and turbine valve testing, continued at or near full power for the remainder of the inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R01 Adverse Weather Protection (71111.01)

- 1. Readiness for Impending Adverse Weather Conditions
- a. Inspection Scope (one sample)

On June 6, the inspectors reviewed actions taken by Entergy in response to a tornado watch for the area. The inspectors reviewed Vermont Yankee Operating Procedure (OP) 3127, "Natural Phenomena," and emergency action levels (EALs) to ensure any applicable actions were taken. The inspectors also discussed the weather situation and status of safety related equipment with the operations shift manager to ensure he was aware of the potential for severe weather and equipment was available, if needed.

b. <u>Findings</u>

No findings of significance were identified.

- 1R04 Equipment Alignment (71111.04)
- 1. Complete Equipment Alignment (71111.04S)
- a. <u>Inspection Scope</u> (one sample)

The inspectors performed a complete equipment alignment walkdown of accessible portions of the reactor building closed cooling water system, with a focus on the portions of the system that would be required for alternate cooling. The inspectors compared the actual equipment alignment to approved piping and instrumentation drawings, operating procedures, and the system description in the Updated Final Safety Analysis Report (UFSAR). The inspectors observed valve positions, the availability of power supplies, and the general condition of the system to verify any deficiencies were identified and did not affect the operability of the system.

b. <u>Findings</u>

No findings of significance were identified.

2. Partial Equipment Alignments (71111.04)

a. Inspection Scope (three samples)

The inspectors performed three partial system walkdowns of risk-significant systems to verify system alignment and to identify any discrepancies that could impact system operability. Observed plant conditions were compared to the standby alignment of equipment specified in Entergy's system operating procedures. The inspectors also observed valve positions, the availability of power supplies, and the general condition of selected components to verify there were no obvious deficiencies. The inspectors evaluated the alignment of the following systems:

- The reactor core isolation cooling (RCIC) system during planned high pressure coolant injection (HPCI) maintenance on May 24, 2005;
- The HPCI, main feedwater, control rod drive, and automatic depressurization systems during RCIC system valve packing replacement on June 3; and
- The "A" train of the standby liquid control (SLC) system during planned maintenance on the "B" train of SLC on June 21.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05Q)

a. Inspection Scope (twelve samples)

The inspectors identified twelve fire areas and zones important to plant risk based on a review of Entergy's Safe Shutdown Capability Analysis for Vermont Yankee and the Individual Plant Examination External Events (IPEEE). The inspectors toured these plant areas in order to verify the suitability of Entergy's control of transient combustibles and ignition sources, and to evaluate the material condition and operational status of fire protection systems, equipment, and barriers. In addition, the inspectors discussed attributes of several of the areas with the fire protection engineer. The following fire areas (FAs), fire zones (FZs) and combustion free zones (CFZs) were inspected:

- Torus room, 213 foot elevation, North (FZ RB1);
- Torus room, 213 foot elevation, South (FZ RB2);
- Reactor building, 252 foot elevation, North (FZ RB3);
- Reactor building, 252 foot elevation, South (FZ RB4);
- Reactor building, 252 foot elevation S1 cable trays (CFZ-3/4);
- Reactor building, 252 foot elevation S2 cable trays (CFZ-3/4);
- Reactor building, 280 foot elevation, North (FZ RB5);

- Reactor building, 280 foot elevation, South (FZ RB7);
- Reactor building, 280 foot elevation, recirc motor generator area (SZ RB-MG)
- Reactor building, 303 foot elevation (FZ RB7);
- Turbine building, all areas (FA TB); and
- Relay house 345 KV (No fire designation).

b. Findings

No findings of significance were identified.

1R06 Flood Protection Measures (71111.06)

a. Inspection Scope (one sample)

The inspectors reviewed Entergy's established flood protection barriers and procedures for coping with external flooding events. The inspectors reviewed external flooding information contained in Entergy's IPEEE and compared it to required flooding actions delineated in OP 3127, "Natural Phenomena." The inspectors performed walkdowns of flood-vulnerable areas and ensured equipment needed to mitigate an external flooding event (e.g., sump pumps, floor drain plugs, sand bags, etc.) was available and in working order. The inspectors also reviewed a sample of problems identified in Entergy's corrective action program to verify that Entergy identified and implemented appropriate corrective actions.

b. Findings

No findings of significance were identified.

1R11 <u>Licensed Operator Requalification</u> (71111.11Q)

a. Inspection Scope (one sample)

The inspectors observed a simulator examination for one operating crew to assess the performance of the licensed operators and the ability of Entergy's Training and Operations Department staff to evaluate licensed operator performance. Crew performance was evaluated during simulated events involving an anticipated transient without a scram and a loss of all high pressure injection to the reactor vessel.

The inspectors evaluated the crew's performance in the areas of:

- Clarity and formality of communications;
- Ability to take timely actions;
- Prioritization, interpretation, and verification of alarms;
- Procedure use:
- Control board manipulations;
- Oversight and direction from supervisors; and
- Group dynamics.

Crew performance in these areas was compared to Entergy management expectations and guidelines as presented in the following documents:

- Vermont Yankee Administrative Procedure (AP) 0151, "Responsibilities and Authorities of Operations Department Personnel";
- AP 0153, "Operations Department Communication and Log Maintenance"; and
- Vermont Yankee Department Procedure (DP) 0166, "Operations Department Standards."

The inspectors evaluated whether the crew completed the critical tasks identified in the simulator evaluation guide. The inspectors also compared simulator configurations with actual control board configurations. For any weaknesses identified, the inspectors observed Entergy evaluators to verify that they also noted the issues to be discussed with the crew.

b. Findings

No findings of significance were identified.

1R12 Maintenance Effectiveness (71111.12Q)

a. <u>Inspection Scope</u> (two samples)

The inspectors performed one issue/problem-oriented inspection of actions taken by Entergy in response to "B" SLC pump packing leakage. The inspectors also performed one system/function performance history-oriented inspection of the containment continuous air monitor (CAM) system. The inspectors reviewed the UFSAR, system design basis documents, operating procedures, system maintenance rule scoping documents, list of historical condition reports written for the CAM and SLC systems, applicable maintenance rule functional failure determinations, and corrective actions taken in response to the equipment problems in accordance with station procedures and the requirements of 10 CFR 50.65.

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessment and Emergent Work Evaluation (71111.13)

a. <u>Inspection Scope</u> (six samples)

The inspectors evaluated on-line risk management for five planned maintenance activities and one emergent condition. The inspectors reviewed maintenance risk evaluations, work schedules, recent corrective actions, and control room logs to verify that other concurrent or emergent maintenance activities did not significantly increase plant risk. The inspectors compared reviewed items and activities to requirements listed

in procedures AP 0125, "Plant Equipment," and AP 0172, "Work Schedule Risk Management - Online." The inspectors reviewed the following on-line work activities:

- (Emergent) Trip of the Scobie 345 kilovolt (KV) offsite power line coincident with the Coolidge line being in a degraded condition during inclement weather;
- Planned limiting condition for operation (LCO) maintenance on the "B" service water pump;
- Planned LCO maintenance on cooling tower CT 2-1;
- Planned LCO maintenance on the HPCI system;
- Replacement of the five volt power supply for the rod position indicating system (RPIS); and
- Planned work, designated as high risk, in the 115 KV switchyard.

b. Findings

No findings of significance were identified.

1R14 Personnel Performance During Non-routine Plant Evolutions (71111.14)

a. Inspection Scope (two samples)

The inspectors assessed the control room and in-plant operators' performance during an April 25, 2005, power reduction to approximately 80% that was requested by the electrical grid operator and a June 28 power reduction to approximately 65% to support a planned control rod sequence exchange and turbine valve testing. The inspectors evaluated the adequacy of personnel performance, procedure compliance, and use of the corrective action process against the requirements and expectations contained in the following station procedures:

- C AP 0091, "Risk Assessment Procedure Temporary Configuration Changes";
- C AP 0151, "Responsibilities and Authorities of Operations Department Personnel";
- C AP 0153, "Operations Department Communication and Log Maintenance"; and
- C DP 0166, "Operations Department Standards."

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. <u>Inspection Scope</u> (seven samples)

The inspectors reviewed seven operability determinations prepared by Entergy. The inspectors evaluated operability determinations against the requirements and guidance contained in NRC Generic Letter 91-18, "Resolution of Degraded and Nonconforming Conditions," as well as Entergy procedure ENN-OP-104, "Operability Determinations."

The inspectors evaluated the adequacy of the following evaluations of degraded or non-conforming conditions:

- Electrical grounds identified while running the cooling fan for the West cooling tower cell 2-1 (This cooling tower cell supports the alternate cooling system.);
- Low residual heat removal service water system pump motor bearing cooling water flow;
- Damage to alternate cooling deep basin cement wall;
- Potential for certain safety related breakers to fail to close electrically;
- RCIC steam line pressure switch root valve packing leak;
- Two broken bolts on control side vertical drive inspection cover of "B" emergency diesel generator (EDG); and
- Licensee identified that reactor protection system testing was not being performed as required by the Technical Specifications (TS).

b. Findings

No findings of significance were identified.

1R19 Post Maintenance Testing (71111.19)

a. <u>Inspection Scope</u> (seven samples)

The inspectors reviewed seven post-maintenance testing (PMT) activities on risk-significant systems. The inspectors either directly observed or reviewed completed PMT documentation to verify that the test data met the required acceptance criteria contained in the TS, UFSAR, and in-service testing program. Where testing was directly observed, the inspectors evaluated whether installed test equipment was appropriate and controlled and that the test was performed in accordance with applicable station procedures. The inspectors also evaluated whether the test activities were adequate to ensure system operability and functional capability following maintenance; that systems were properly restored following testing; and that any discrepancies were appropriately documented in the corrective actions program. The inspectors reviewed the PMTs performed after the following maintenance activities were completed:

- Cooling tower fan CT 2-1 cable re-routing;
- Replacement of control side sections of the "B" EDG fuel oil injector camshaft;
- HPCI planned LCO maintenance;
- Planned maintenance on the "A" train of the standby gas treatment system;
- Replacement of the diesel driven fire pump;
- Replacement of the five volt power supply for the RPIS system; and
- Troubleshooting and repair of the feedwater master level controller.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope (seven samples)

The inspectors observed surveillance testing to evaluate whether each test was performed in accordance with the written procedure, the acceptance criteria specified for each test was consistent with the requirements of the TS and UFSAR, test data was complete and met procedural requirements, and the system was properly returned to service following the completion of testing. The inspectors observed selected pre-job briefings supporting testing. The inspectors also evaluated whether discrepancies identified were entered into the corrective action program. The inspectors evaluated whether testing in accordance with the following procedures met the above requirements:

OP 4105	Fire Protection Systems Surveillance; Section D, "Eighteen Month Fire Pump Operational Performance, Capacity Check and Diesel Fire Pump Alarm/Shutdown Test"
OP 4114	Standby Liquid Control System Surveillance; Section B, "Pump Operability and Comprehensive Tests and Discharge Check Valve Test"
OP 4116	Secondary Containment Surveillance; Section A, "Secondary Containment Capability Test"
OP 4121	Reactor Core Isolation Cooling System Surveillance; Section C, "RCIC Pump Operability and Full Flow and Comprehensive Test"
OP 4126	Diesel Generator Surveillance; Section B, "Monthly ["B"] Diesel Generator Slow Start Operability Test"
OP 4152	Equipment and Floor Drain Sump and Totalizer Surveillance, and
OP 4400	Calibration of the Average Power Range Monitoring System to Core Thermal Power

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope (one sample)

The inspectors reviewed temporary modification (TM) 2005-004, "Installation of Structural Steel Splices in Cooling Tower CT 2-1," and calculation VYC-2404, "Design of Structural Member Splices on Cooling Tower CT-2 for TM 2005-004," and discussed the modification with the responsible engineer to ensure that the modification did not adversely affect the availability or functional capability of the cooling tower. The inspectors also walked down the accessible portions of CT 2-1 to verify the TM was properly maintained and there were no obvious deficiencies.

b. <u>Findings</u>

No findings of significance were identified.

Cornerstone: Emergency Preparedness

1EP6 Drill Evaluation (71114.06)

a. <u>Inspection Scope</u> (one sample)

The inspectors observed an operating crew evaluate a simulator-based event using the station EALs during licensed operator requalification training activities. The inspectors discussed the performance expectations and results with the lead instructor. The inspectors focused on the ability of licensed operators to perform event classification and make proper notifications in accordance with the following station procedures and industry guidance:

- AP 0153, "Operations Department Communications and Log Maintenance";
- AP 0156, "Notification of Significant Events";
- AP 3125, "Emergency Plan Classification and Action Level Scheme";
- DP 0093, "Emergency Planning Data Management";
- OP 3540, "Control Room Actions During an Emergency"; and
- Nuclear Energy Institute (NEI) 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 2.

b. <u>Findings</u>

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Public Radiation Safety

2PS1 Gaseous and Liquid Effluents (71122.01)

a. Inspection Scope (one sample)

The inspectors performed an in-office review of the following documents to evaluate the effectiveness of the licensee's radioactive gaseous and liquid effluent control programs. In addition, telephone interviews were conducted with Entergy chemistry staff and their contractors. The criteria for this review were the requirements for radioactive effluent controls as specified in the TS and the Offsite Dose Calculation Manual (ODCM).

Changes to the ODCM, Revision 29, Section 6.11, concerning direct dose calculation methodology were reviewed. This included a review of bases documents including: Summary Report, "In Situ Measurements Performed at Vermont Yankee Nuclear Power

Station," published February 13, 2002, by Duke Engineering & Services Environmental Laboratory; ANSI/ANS-6.1.1-1991, "Neutron and Gamma-Ray Fluence-to-Dose Factors"; and NISTIR 5632, "Tables of X-Ray Mass Attenuation Coefficients and Mass Energy-Absorption Coefficients."

b. <u>Findings</u>

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA2 Identification and Resolution of Problems (71152)

1. Routine Review of Identification and Resolution of Problems

a. <u>Inspection Scope</u>

The inspectors routinely reviewed issues during baseline inspection activities and plant status reviews to verify they were being entered into Entergy's corrective action system at an appropriate threshold and that adequate attention was being given to timely corrective actions. Additionally, in order to identify repetitive equipment failures and/or specific human performance issues for follow-up, the inspectors performed a daily screening of items entered into Entergy's corrective action program. This review was accomplished by reviewing selected hard copies of condition reports (a listing of CRs reviewed is included in the Attachment to this report) and/or by attending daily screening meetings.

b. Findings

No findings of significance were identified.

2. <u>Annual Sample Review - Risk Assessment Program Implementation</u>

a. <u>Inspection Scope</u> (one sample)

The inspectors selected Entergy's implementation of the risk assessment program for review based on several NRC and licensee-identified issues in the past year. The issues occurred both online and during the refueling outage and included both incorrect outage risk determinations and failures to hang a portion of critical plant equipment signs when maintenance was performed on safety-related equipment. A listing of reviewed CRs is included in the Attachment to this report. The CRs were reviewed to ensure the issues were identified accurately, appropriate evaluations were performed, and adequate corrective actions were specified and properly prioritized.

b. <u>Findings and Observations</u>

No findings of significance were identified. However, the inspectors identified one corrective action, a procedure change, that was closed in the corrective action program but was not completed. The licensee subsequently wrote CR 2005-1763 to identify this issue and track the procedure change to completion. Entergy's failure to complete the procedure change before closing the item in the corrective action program is a violation of Entergy procedure AP 0009, "Condition Reports." The procedure violation is of minor significance because the procedure change was an improvement item which related to risk reviews performed during outages. Entergy did not have an outage in the time between the due date for the corrective action and the time the error was discovered. In addition, the issue was entered into the corrective action program. Therefore, the finding is not subject to enforcement in accordance with Section VI of the NRC's Enforcement Policy.

3. Semi-Annual Trend Review

a. Inspection Scope

As required by Inspection Procedure 71152, "Identification and Resolution of Problems," the inspectors performed a semi-annual trend review to identify trends, either Entergy or NRC identified, that might indicate the existence of a more significant safety issue. Included within the scope of this review were:

- CRs generated from January through June 2005;
- Corrective maintenance backlog listings from January through June 2005;
- The corrective action program 4th Quarter 2004 and 1st Quarter 2005 trend reports; and
- Daily review of main control room operating logs.

b. Findings

No findings of significance were identified.

4OA5 Other Activities

1. Temporary Instruction (TI) 2515/163: Operational Readiness of Offsite Power

The inspectors reviewed Entergy procedures and supporting information pertaining to offsite power availability and operability. The inspectors evaluated these procedures against the requirements of 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants;" 10 CFR 50.63, "Loss of All Alternating Current Power;" 10 CFR 50, Appendix A, Criterion 17, "Electric Power Systems;" and TS. The results of this inspection were forwarded to NRR for further review. Entergy procedures and supporting information reviewed by the inspectors are listed in the Attachment to this report.

4OA6 Meetings, Including Exit

Resident Exit

On July 11, the resident inspectors presented the inspection results to Messrs. William Maguire and John Dreyfuss and members of their staff. The inspectors asked whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Entergy Personnel

- J. Callaghan, Design Engineering Manager
- P. Corbett, Maintenance Manager
- J. Dreyfuss, Director of Engineering
- J. Devincentis, Licensing Manager
- M. Gosekamp, Superintendent of Operations Training
- M. Hamer, Licensing
- M. Metell, Engineering
- W. Maguire, General Plant Manager
- J. Thayer, Site Vice President
- C. Wamser, Operations Manager
- R. Wanczyk, Director of Nuclear Safety
- S. Wender, Chemistry Superintendent

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

None.

LIST OF DOCUMENTS REVIEWED

Section 4OA5.1: Temporary Instruction (TI) 2515/163

Vermont Yankee/Entergy Procedures

AP 0156, "Notification of Significant Events"

AP 0172, "Work Schedule Risk Management - On Line"

AP 3125, "Vermont Yankee Emergency Action Levels, Section 6, "Loss of Power""

Vermont Yankee Off-Normal (ON) Procedure 3172, "Loss of Bus 4"

ON 3171, "Loss of Bus 3"

ON 3155, "Loss of Auto Transformer"

ON 3150, "Loss of Startup Transformer"

Operational Transient Procedure (OT) 3122, "Loss of Normal Power"

OP 2140, "345 KV Electrical System"

Annunciator Response Sheet (ARS) for annunciator 8-J-9, "Safety Bus Voltage Low"

Timeline for Alternate AC Source Startup and Alignment for Station Blackout Conditions.

Entergy Procedure ENN-PL-158, "Transmission Grid Interface"

ISO New England Procedures

Master/LCC Procedure #1, "Nuclear Plant Transmission Operations" Operating procedure #4, "Action During a Capacity Deficiency"

Section 4OA2: Review of Problem Identification and Resolution

Condition Reports

2004-3000	"A" SLC Pump Leakage Increasing Trend
2004-3521	Containment CAM particulate warning alarm in
2005-0004	Containment CAM particulate alarming
2005-0226	Containment CAM particulate high readings
2005-0520	Containment CAM operability adverse trend
2005-0569	Containment CAM particulate level caused unexpected alarm
2005-0591	Procedure requirements not met for Quarterly Trend Report
2005-0621	Containment CAM paper tear switch damaged
2005-0700	Unexpected rod blocks
2005-0819	Containment CAM paper tear indication cam is broken
2005-0878	"B" EDG control side fuel oil injector cam lobe excessive wear
2005-0924	High fuel filter differential pressure on the "B" EDG
2005-0925	"B" EDG exhaust for #10 cylinder reading low
2005-0926	Unexpected Containment CAM alarm
2005-0991	Loss of flow through containment CAM with no low flow alarm
2005-0996	Containment Air Monitor detector gasket not seated properly
2005-1011	RHRSW pump motor bearing cooling flows found out of spec low
2005-1022	Diesel driven fire pump gear backlash found out of tolerance
2005-1165	NODES discharge permit limit exceeded
2005-1190	Isotopic analysis of reactor coolant surveillance interval missed
2005-1201	Recirc pump "A" outboard seal pressure oscillations
2005-1219	Adverse trend on no-go badge detector operation at Gate 2
2005-1224	Piping leak on containment CAM
2005-1230	Paper tear alarm in for containment CAM
2005-1232	Adverse trend (2) for containment CAM
2005-1278	Containment CAM low flow alarm NOT received as
2005-1317*	Internal flooding design basis document discrepancy
2005-1318*	Fire Hazards Analysis compliance issue regarding coated cables
2005-1367*	Potential Rework WR#05-64474 was written against Level Transmitter
2005-1368*	Large quantities of mercury in plant
2005-1392	CT-2 deep basin damage
2005-1427	Containment rad monitor failure
2005-1502	Ground detected on cooling tower fan CT 2-1
2005-1605*	Some critical plant equipment signs not hung during HPCI LCO maintenance
2005-1623	Multiple rod drift alarms
2005-1633*	Fire hazards analysis discrepancy noted by NRC
2005-1641	A cutoff switch on an AK-50 breaker could not be reset
2005-1655*	Post job critique item for RPIS jumper replacement documentation
2005-1685	Steam leakage from RCIC valve 800C
2005-1740*	HPCI quad equipment funnel overflows periodically
2005-1763*	Commitment Closure not in accordance with EN-LI-102
2005-1783*	Potential spread of radioactive material from HPCI room floor scupper

2005-1884	Two broken bolts on control side vertical drive inspection cover of "B" EDG
2005-1893	SLC Pump has packing leakage from 2 of 3 cylinders
2005-1953	Feedwater master controller not responding to operator input

^{*}Inspector-identified issues

Section 4OA2.2: Review of Risk Assessment Program Implementation

Condition Reports

2003-0155*	Not all critical plant equipment signs required by "B" RHR LCO plan were hung
2003-1512*	Critical plant equipment sign not posted as required
2004-0596*	ORAM color change made after equipment tagged out
2004-0840*	Incorrect status of decay heat removal logged on the critical outage system status form
2004-0897*	Incorrect start dates used in ORAM risk assessment for alternate decay heat removal capability determinations
2004-2345*	Posting critical plant equipment signs process needs to be formalized
2004-3474*	Critical plant equipment signs not posted as required
2004-3719	Critical plant equipment not properly identified in the "A" core spray LCO plan
2005-1033	Critical plant equipment sign not hung in advance of electric fire pump
2005-1458	Outage risk assessment per AP 0173 results in missed contingency
2005-1605*	Some critical plant equipment signs not hung during HPCI LCO maintenance
2005-1763*	NRC identified that a commitment closure was inappropriately closed

^{*}Inspector-identified issues

LIST OF ACRONYMS

ADAMS ANSI AP	Automated Document Access Management System American National Standard Institute Vermont Yankee Administrative Procedure
CAM	Continuous Air Monitor
CFR	Code of Federal Regulations
CFZ	Combustion Free Zones
DP	Vermont Yankee Department Procedure
EAL	Emergency Action Level
EDG	Emergency Diesel Generator
FA	Fire Area
FIN	Finding
FZ	Fire Zone
HPCI	High Pressure Coolant Injection
IPEEE	Individual Plant Examination External Events
LCO	Limiting Condition for Operation
KV	Kilovolt
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission

NRR Nuclear Reactor Regulation
ODCM Offsite Dose Calculation Manual

ON Vermont Yankee Off-Normal Procedure OP Vermont Yankee Operating Procedure

PMT Post Maintenance Testing
RCIC Reactor Core Isolation Cooling

RHRSW Residual Heat Removal Service Water

RPIS Rod Position Indicating System

SLC Standby Liquid Control
TI Temporary Instruction
TM Temporary Modification
TS Technical Specifications

UFSAR Updated Final Safety Analysis Report

VY Vermont Yankee

VYC Vermont Yankee Calculation