

January 13, 2000

Mr. Samuel L. Newton  
Vice President, Operations  
Vermont Yankee Nuclear Power Corporation  
185 Old Ferry Road  
Brattleboro, VT 05301

SUBJECT: PROPOSED REVISION TO THE VERMONT YANKEE OPERATIONAL  
QUALITY ASSURANCE MANUAL - VERMONT YANKEE NUCLEAR POWER  
STATION (TAC NO. MA7132)

Dear Mr Newton:

By letter dated November 12, 1999, as supplemented on November 16, 1999, you submitted a request for approval of a quality assurance program change, characterized as a reduction in commitment under 10 CFR 50.54(a). The change would reduce the Vermont Yankee Operational Quality Assurance Manual (VOQAM) commitments by relocating the safety classification of systems, structures, and components to the Final Safety Analysis Report (FSAR). Also, the change would modify the presently approved exception to the American National Standard Institute (ANSI) N18.7-1976 regarding periodic procedure review.

Based on our review of the VOQAM, we have concluded that the changes are acceptable. The changes in commitment satisfy the review guidance provided in NUREG-0800, "Standard Review Plan," Section 17.2 and the regulatory requirements in 10 CFR Part 50, Appendix B. Our safety evaluation is enclosed.

Sincerely,

*/RA/*

Richard P. Croteau, Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-271

Enclosure: Safety Evaluation

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

VERMONT YANKEE NUCLEAR POWER CORPORATION

REVIEW OF SAFETY CLASSIFICATION AND PERIODIC PROCEDURE REVIEW

VERMONT YANKEE NUCLEAR POWER STATION

DOCKET NO. 50-271

1.0 INTRODUCTION

By letter dated November 12, 1999, as supplemented by letter dated November 16, 1999, Vermont Yankee Nuclear Power Corporation (Vermont Yankee) submitted a request for approval of a quality assurance program change, characterized as a reduction in commitment under 10 CFR 50.54(a). The change would reduce the Vermont Yankee Operational Quality Assurance Manual (VOQAM) commitments by relocating the safety classification of systems, structures and components to the Final Safety Analysis Report (FSAR) from the VOQAM. Also, the change modifies the presently approved exception to American National Standard Institute (ANSI) N18.7-1976 regarding periodic procedure review.

2.0 EVALUATION

2.1 Safety Classification

Vermont Yankee proposes to modify the exception statement and alternative actions presently described in the VOQAM Appendix B, Section VII. Vermont Yankee proposes to relocate the present safety classification requirements without change from the VOQAM to the FSAR. The following is the proposed language for VOQAM Appendix B, Section VII:

Exception:

~~The Vermont Yankee plant~~ takes exception to the Regulatory Guide [1.26, Revision 3] in its entirety. Vermont Yankee also takes exception, in general, to inclusion of safety classification basis requirements in the Quality Assurance Program.

Alternatives:

~~Vermont Yankee shall continue to classify structures, components and systems in accordance with ANS 22, Draft No. 4, Rev. 1, May 1973. "Nuclear Safety Criteria for the Design of Stationary Boiling Water Reactor Plants," as in the past will identify appropriate industry-standard criteria for safety classifications of systems, structures and components in the Final Safety Analysis Report, subject to the provisions of 10 CFR 50.59.~~

The Nuclear Regulatory Commission (NRC) staff agrees that the safety classification criteria can be relocated from the VOQAM to the FSAR. The safety classification criteria located in the FSAR will be controlled under 10 CFR 50.59. The inclusion of the safety classification information in the FSAR must be completed prior or simultaneously to implementation of this change in the VOQAM. This change is acceptable and continues to meet the requirements of 10 CFR Part 50, Appendix B.

## 2.2 Periodic Procedure Review

Vermont Yankee proposes to modify the alternative actions presently contained in VOQAM Appendix B, Section IX, Item B, by excusing routine plant procedures from the periodic, scheduled review described in ANSI N18.7-1976. Vermont Yankee proposes that routine plant procedures that have been used at least biennially may be excused from further review on the basis that they receive an appropriate degree of scrutiny by individuals knowledgeable in the procedures.

The four key elements for the proposed periodic procedure review process for Vermont Yankee are (1) at least every 2 years, Vermont Yankee's Quality Assurance organization will audit a representative sample of routine plant procedures that are used more frequently than every 2 years, (2) all applicable plant procedures will be reviewed following an unusual incident, unexpected transient, operator error, or equipment failure, and following a modification, (3) routine plant procedures that have been used at least biennially receive scrutiny by individuals knowledgeable in the procedures, and are updated as necessary to ensure adequacy during suitable controlled activities, and (4) routine plant procedures that have not been used for 2 years will be reviewed before use to determine if changes are necessary or desirable. Elements 1, 2, and 4 are not changed from the current VOQAM. The third element is an acceptable method to review procedures because the procedure is tested through actual use. This satisfies the intent of the review criteria in ANSI 18.7, Section 5.2.15.

## 3.0 CONCLUSION

According to 10 CFR Part 50, Appendix B, Criterion II, "the applicant shall identify the structures, systems, and components to be covered by the quality assurance program." To address this requirement, Vermont Yankee currently describes their safety classification criteria in the VOQAM. However, Vermont Yankee proposes to relocate the safety classification criteria to their FSAR to be controlled pursuant to 10 CFR 50.59. The NRC staff has determined that this is an acceptable method to meet the intent of 10 CFR Part 50, Appendix B, Criterion II.

ANSI N18.7 is an NRC-accepted method to meet the requirements of 10 CFR Part 50, Appendix B, Criteria V, VI, and XVIII. Criterion VI requires measures to assure that procedures including changes are reviewed for adequacy. The periodic procedure review process states (1) at least every 2 years, Vermont Yankee's Quality Assurance organization will audit a representative sample of routine plant procedures that are used more frequently than every 2 years, (2) all applicable plant procedures will be reviewed following an unusual incident, unexpected transient, operator error, or equipment failure, and following a modification, (3) routine plant procedures that have been used at least biennially receive scrutiny by individuals knowledgeable in the procedures, and are updated as necessary to ensure adequacy during suitable controlled activities, and (4) routine plant procedures that have not been used for 2 years will be reviewed before use to determine if changes are necessary or desirable. The NRC staff has determined that this is an acceptable method to meet 10 CFR Part 50, Appendix B, Criterion VI.

Principal Contributor: M. Bugg

Date: January 13, 2000

Vermont Yankee Nuclear Power Station

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