



VERMONT YANKEE NUCLEAR POWER CORPORATION

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BVY 00-23

United States Nuclear Regulatory Commission
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- Reference:
- (a) Letter, VYNPC to USNRC, "Annual Submittal of Quality Assurance Program Changes," BVY 99-135, dated December 21, 1999.
 - (b) Letter, USNRC to Washington Public Power Supply System (WPPSS), "Proposed Revision 26 to Operational Quality Assurance Program," dated December 30, 1998.
 - (c) Letter, USNRC to Clinton Power Station, "Reduction in Commitments in Quality Assurance Program for Clinton Power Station," dated February 3, 1999.

**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
Vermont Yankee Operational Quality Assurance Manual Revision 4**

Enclosed for your review is Revision 4 of the Vermont Yankee Operational Quality Assurance Manual (VOQAM). This is a supplement to the VOQAM revision submitted with Reference (a), and is being forwarded for incorporation into that submittal as requested in a telephone conversation between the Staff and Vermont Yankee (VY) on January 11, 2000. Please place the Revision 4 Summary of Changes at the front of the Revision 3 program document submitted with Reference (a) and substitute the other Revision 4 sections enclosed herewith for their Revision 3 counterparts. The supplemented document will constitute VY's annual Quality Assurance Program submittal pursuant to 10CFR50.54(a)(3) and 10CFR50.71(e).

Description of the Change

VY has included in the applicable VOQAM sections those conditions that formed the bases for the Staff's approval of portions of two QA Program submittals from other licensees, documented in References (b) and (c), that VY used under 10CFR50.54(a)(3) to make similar program changes without prior NRC approval as part of VOQAM Revision 3. The enclosed Revision 4 now includes provisions similar to those the Staff placed on the other licensees as conditions of approval for certain reductions in quality assurance commitments. Inclusion of these approval conditions in this submittal documents our application of the NRC's approval bases to the VY changes.

Reason for the Change

Although not specifically stated in the regulation, the Staff expects that the verification of applicability of the NRC's prior approval bases to a third-party licensee's facility will be reflected by inclusion of detail sufficient for that purpose in the affected Quality Assurance program document. VY had previously included this level of detail in the associated written 10CFR50.54(a)(3) evaluation, which is an internal document not subject to NRC acceptance. The Staff, in comparing Reference (a) to References (b) and (c), was unable to satisfactorily conclude that the requirements of 10CFR50.54(a)(3) had been met.

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