

February 25, 2000

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

SUBJECT: VERMONT YANKEE NUCLEAR POWER STATION, REQUEST FOR
ADDITIONAL INFORMATION REGARDING LICENSE TRANSFER
(TAC NO. MA7875)

Dear Mr. Newton:

On February 24, 2000, we held a telephone conference with members of your staff regarding the proposed license transfer for Vermont Yankee Nuclear Power Station. During the telephone conference we discussed the enclosed request for additional information. The information is needed to complete our review of the (1) management and technical support organization and (2) the operating organization related to the proposed transfer of the operating license.

Please provide the requested information by March 14, 2000, as agreed to by Mr. Wayne Limberger of your staff on February 24, 2000.

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: As stated

cc w/encl: See next page

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DATE	2/21/00	2/24/00	/ /00	/ /00	2/25/00

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Vermont Yankee License Transfer to AmerGen Vermont
Request for Additional Information

The following information is requested to complete the review of the (1) management and technical support organization and (2) the operating organization related to the proposed transfer of the operating license for the Vermont Yankee Nuclear Power Station to AmerGen Vermont:

1. With regard to the management and technical support organization, Section V, "Technical Qualifications of AmerGen Vermont," page 18, states that technical support for the Vermont Yankee Nuclear Power Station will be provided in one of three ways:
 - a. Existing staff, who are not located on site, will continue to perform on behalf of AmerGen Vermont
 - b. Transfer of the technical support function to AmerGen (the parent company)
 - c. Transfer of the technical support function to contractors.

However, there is no information provided in the January 6, 2000, submittal that demonstrates how the organizational structure for any of the three options would provide for the integrated management of activities to support the operation and maintenance of the facility.

Identify the option that will be exercised at the time of the transfer. Supporting information, as listed below for each of the options, must be provided. If no single option can be identified, supporting information for all three options is needed to ensure that sufficient technical resources will continue to be provided to adequately support safe operation of the nuclear plant.

If option (a), will the existing offsite staff become AmerGen Vermont employees? If so, provide supporting organizational charts showing the reporting relationship and lines of authority for the offsite organization providing technical support to the onsite Vermont Yankee Nuclear Station organization. If the existing offsite technical support staff will not become AmerGen Vermont employees but will still be used to provide technical support, describe how sufficient technical support to the Vermont Yankee facility will be assured.

If option (b), provide supporting organizational chart showing the lines of authority back to AmerGen (the parent company). In addition, provide information about how the wholly owned AmerGen Vermont subsidiary will be assured sufficient technical support resources when competing with other nuclear facilities owned by AmerGen (the parent company.)

ENCLOSURE

If option (c), identify if the contractor support will be directly to AmerGen Vermont or thru AmerGen (the parent company). If through AmerGen, provide an organizational chart showing the lines of authority from AmerGen Vermont through AmerGen to the contractor. In addition, provide information about how AmerGen Vermont will be assured sufficient technical support resources using that contracting arrangement.

2. Provide resumes for the Chief Nuclear Officer and for the AmerGen Vermont Vice President, Vermont Yankee.
3. With regard to the operating organization, Section V, "Technical Qualifications of AmerGen Vermont," page 16, states "the existing VYNPC nuclear organization at the Vermont Yankee site will be transferred to AmerGen Vermont, and substantially all of the VYNPC nuclear employees at the Vermont Yankee site involved in the operation and maintenance of the plant will assume similar roles and responsibilities for AmerGen Vermont." Further, page 17 states that "the plant staff, including senior managers, will be substantially unchanged." On the basis of the above information and the information contained in the remainder of the submittal, the definition of "substantially unchanged" is interpreted as:

"the current onsite organizational structure and the assignment of primary responsibility to the plant staff of those onsite organizations will be transferred without change."

Verify this is the correct interpretation or submit the intended meaning for "substantially unchanged."

Vermont Yankee Nuclear Power Station

cc:

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