

50-271



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 30, 1996

Mr. Donald A. Reid
Vice President, Operations
Vermont Yankee Nuclear Power Corporation
Ferry Road
Brattleboro, VT 05301

SUBJECT: STATUS OF REVIEW OF CORRECTIVE ACTIONS RELATED TO APPENDIX R ISSUES
AT VERMONT YANKEE

Dear Mr. Reid:

By letter dated February 13, 1996, the NRC issued a Notice of Violation (NOV) to Vermont Yankee Nuclear Power Corporation (VYNPC) for noncompliances with the fire protection requirements of Appendix R to 10 CFR Part 50 at Vermont Yankee Nuclear Power Station (Vermont Yankee). By letter dated March 12, 1996, in its response to this NOV, VYNPC committed to achieve compliance with Appendix R at Vermont Yankee by startup from the fall 1996 refueling outage. An element of meeting this commitment included obtaining NRC approval of several requests for exemption from Appendix R. Vermont Yankee continued to operate until the fall 1996 refueling outage based on the compensatory measures VYNPC had implemented for identified noncompliances. In a meeting with VYNPC representatives on August 1, 1996, to review the status of VYNPC's actions to restore compliance with Appendix R, the NRC staff requested additional information regarding the proposed exemptions in order to complete its review. (This information was formally requested by the NRC in a letter dated September 20, 1996.) At the August 1, 1996, meeting, the NRC staff informed the licensee that it did not anticipate completing its review of the proposed exemptions by startup from the fall 1996 refueling outage. The refueling outage began on September 6, 1996.

On October 21, 1996, representatives of VYNPC met with the NRC staff to discuss the status of VYNPC's actions regarding its commitment and the compensatory measures it planned to implement at the time of restart from the fall 1996 refueling outage until the proposed exemptions are processed by the NRC. By letters dated October 22, 26, and 28, 1996, VYNPC submitted detailed information regarding the compensatory measures to be implemented at the time of restart. The letters also discussed interim safe shutdown strategies that could be implemented. In addition, as described in VYNPC's letter dated October 26, 1996, VYNPC's corrective actions related to the above NOV that are unrelated to the exemption requests, such as design modifications and procedure changes, were completed before the end of the fall 1996 refueling outage.

The compensatory measures to be implemented in the plant areas proposed for exemption include administrative controls governing hot work and the introduction of combustible materials, continuous and roving fire watches, and additional staffing to accommodate timely use of the "A" emergency diesel generator as the alternative safe shutdown ac electrical power source. To compensate for areas with no approved emergency lighting, the control room

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will be equipped with portable lanterns for use by operators. In addition, senior plant management will regularly verify implementation of these compensatory measures by direct observation. In its letters, VYNPC committed to maintain the compensatory measures until the proposed exemptions are processed by the NRC.

Based on the information provided by VYNPC in the correspondence noted above, the NRC staff has reviewed and verified the compensatory measures that VYNPC has implemented at Vermont Yankee. The NRC staff finds that the combination of Vermont Yankee's compensatory measures, and defense-in-depth fire protection features, recently enhanced by design modifications and procedure changes, provides reasonable assurance that an adequate level of fire safety will be maintained. Overall, the time to complete those corrective actions related to the issues identified in the February 13, 1996, NOV is reasonable.

The NRC staff expects VYNPC to respond to the request for additional information dated September 20, 1996, by the requested date of November 4, 1996. VYNPC, in its letter dated October 28, 1996, committed to answer any subsequent technical questions from the NRC staff by December 15, 1996. Therefore, VYNPC's responses to any additional information requests concerning the proposed exemptions up to this date must be sufficiently thorough and indepth to allow completion of the NRC staff's review. At the completion of this review, the NRC staff will take appropriate action regarding VYNPC's proposed exemptions relative to operation of the Vermont Yankee facility.

Sincerely,

[original signed by S. Varga]

Steven A. Varga, Director
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-271

cc: See next page

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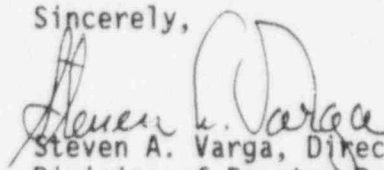
October 30, 1996

will be equipped with portable lanterns for use by operators. In addition, senior plant management will regularly verify implementation of these compensatory measures by direct observation. In its letters, VYNPC committed to maintain the compensatory measures until the proposed exemptions are processed by the NRC.

Based on the information provided by VYNPC in the correspondence noted above, the NRC staff has reviewed and verified the compensatory measures that VYNPC has implemented at Vermont Yankee. The NRC staff finds that the combination of Vermont Yankee's compensatory measures, and defense-in-depth fire protection features, recently enhanced by design modifications and procedure changes, provides reasonable assurance that an adequate level of fire safety will be maintained. Overall, the time to complete those corrective actions related to the issues identified in the February 13, 1996, NOV is reasonable.

The NRC staff expects VYNPC to respond to the request for additional information dated September 20, 1996, by the requested date of November 4, 1996. VYNPC, in its letter dated October 28, 1996, committed to answer any subsequent technical questions from the NRC staff by December 15, 1996. Therefore, VYNPC's responses to any additional information requests concerning the proposed exemptions up to this date must be sufficiently thorough and in-depth to allow completion of the NRC staff's review. At the completion of this review, the NRC staff will take appropriate action regarding VYNPC's proposed exemptions relative to operation of the Vermont Yankee facility.

Sincerely,


Steven A. Varga, Director
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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D. Reid
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Vermont Yankee Nuclear Power Station

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