

VERMONT YANKEE NUCLEAR POWER CORPORATION

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April 23, 2001
BVY 01-30

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

References: (a) Letter, USNRC to YAEC, "10CFR50.54 Quality Assurance Program Change Review," dated May 3, 1996.
(b) Letter, USNRC to VYNPC, "Proposed Revision to the Vermont Yankee Operational Quality Assurance Manual – Vermont Yankee Nuclear Power Station (TAC No. MA7132)," NVY 00-04, dated January 13, 2000.

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

Enclosed for your review is a proposed revision to the Vermont Yankee (VY) Operational Quality Assurance Manual (VOQAM). This revision modifies the VOQAM Appendix B exception to ANSI N18.7-1976 to remove the two-year usage threshold as a determinant of the review requirements for routine procedures. This condition was imposed via Reference (a) in response to VY's request to change from a biennial procedure review cycle to a user-defined frequency. In Reference (b), VY obtained further NRC approval to entirely eliminate periodic procedure reviews on the basis that the necessity or desirability of procedure changes is adequately detected during a wide range of controlled activities (including identification prior to and during procedure use); however, the two-year usage threshold remained intact. Since that time VY has determined that the administrative burden associated with tracking usage of routine procedures represents a hardship that is not commensurate with the limited value added by this stipulation. VY believes that the assessment of adequacy performed by knowledgeable personnel prior to and during use of a routine procedure is sufficient to reveal necessary or desirable changes. Substantiating this belief, procedure revision records show that, on average, routine procedures were subjected to revision at least once in the last year. In addition, VY personnel are trained to halt performance of any procedure that cannot be implemented as written, place the affected equipment in a safe condition and report the discrepancy to management for correction. These provisions are exercised regardless of the interval since the last use of a procedure and VY expects its personnel to employ sound judgement and a strong questioning attitude in performing these actions.

Description of the Change

Vermont Yankee proposes to remove the language from Exception IX.B of VOQAM Appendix B regarding the two-year usage threshold that is presently applied to determine the review frequency for routine procedures. No change is required to the "Justification" section of the exception, which already recognizes that the need for procedure changes may be identified prior to or during procedure use. Attachment 1 and Attachment 2 provide, respectively, marked-up and retyped versions of the revised language.

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Reason for the Change

This change will remove the burden of tracking procedure usage for the purpose of determining which have exceeded two years between uses and which, therefore, require a specific review prior to use. The rigor of the VY operating staff's assessment of routine procedure adequacy, both before and during each use, is sufficient to render a specific review redundant when applied in addition to the procedure user's immediate scrutiny.

Basis for Acceptability of the Change

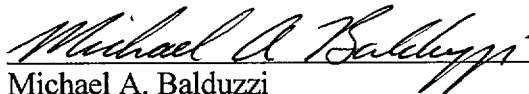
VY has evaluated these changes in accordance with 10CFR50.54(a)(3) and has determined that certain of the changes constitute reductions in commitment that require NRC approval prior to implementation. VY hereby requests NRC approval of these changes by July 31, 2001 on the basis that: (1) the requirement to observe a two-year usage threshold for routine procedures imposes an undue burden in tracking of procedure use to determine which have exceeded the threshold; and (2) the assessment of procedure adequacy performed by users both prior to and during use of routine procedures provides effective and timely assurance that correct, current procedures will be applied to plant activities, particularly when taken in combination with the other VOQAM-described bases for elimination of periodic procedure review requirements.

These changes will have no effect on VY's commitment to review non-routine (event-driven) procedures on a biennial frequency.

If you have any questions regarding this submittal, please contact Mr. Wayne M. Limberger at (802) 258-5830.

Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Michael A. Balduzzi
Vice President, Operations

Attachments

cc: USNRC Region 1 Administrator
USNRC Resident Inspector – VYNPS
USNRC Project Manager – VYNPS
Vermont Department of Public Service

ATTACHMENT 1

Vermont Yankee Nuclear Power Station

Proposed Revision to the

Vermont Yankee Operational Quality Assurance Manual

Marked-up Page

VERMONT YANKEE NUCLEAR POWER CORPORATION

APPENDIX B

(continued)

Alternative:

Plant procedures will be assessed for adequacy either periodically or continuously in accordance with administrative controls. When periodic review is used as the assessment method, these controls will establish a schedule for review.

All applicable plant procedures will be reviewed following an unusual incident, unexpected transient, operator error, or equipment failure (malfunction), and following a modification to a system.

Routine procedures are ^{managing,} ^{are assessed by users} ^{and during} those regularly exercised procedures that provide the fundamental written guidance for routinely operating and maintaining the plant. Routine plant procedures ~~that have not been used for two years will be reviewed~~ before use to determine if changes are necessary or desirable. 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, and are updated as necessary to ensure adequacy during suitably controlled activities such as normal procedure usage, development of plant modifications, industry experience reviews, licensing actions, training activities, corrective actions for nonconforming conditions, and quality assurance audits and surveillances.

Nonroutine procedures are those procedures whose use is event-driven, such as Emergency Operating Procedures, Emergency Plan Implementing Procedures, Off-Normal Procedures, and Operational Transient Procedures; these procedures will be reviewed every two years. However, if a nonroutine procedure is fully exercised and there is a detailed scrutiny of the entire procedure as part of a documented training program, this may serve as the biennial review of the procedure used.

At least every two years, the Quality Assurance (or other independent) organization shall audit a representative sample of routine plant procedures that are used more frequently than every two years. The audit is to ensure the acceptability of the procedures and verify that the procedure review/assessment and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.

ATTACHMENT 2

Vermont Yankee Nuclear Power Station

Proposed Revision to the

Vermont Yankee Operational Quality Assurance Manual

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VERMONT YANKEE NUCLEAR POWER CORPORATION

APPENDIX B

(continued)

Alternative:

Plant procedures will be assessed for adequacy either periodically or continuously in accordance with administrative controls. When periodic review is used as the assessment method, these controls will establish a schedule for review.

All applicable plant procedures will be reviewed following an unusual incident, unexpected transient, operator error, or equipment failure (malfunction), and following a modification to a system.

Routine procedures provide the fundamental written guidance for routinely managing, operating and maintaining the plant. Routine plant procedures are assessed by users before and during use to determine if changes are necessary or desirable. Routine procedures receive an appropriate degree of scrutiny by individuals knowledgeable in the procedures, and are updated as necessary to ensure adequacy during suitably controlled activities such as normal procedure usage, development of plant modifications, industry experience reviews, licensing actions, training activities, corrective actions for nonconforming conditions, and quality assurance audits and surveillances.

Nonroutine procedures are those procedures whose use is event-driven, such as Emergency Operating Procedures, Emergency Plan Implementing Procedures, Off-Normal Procedures, and Operational Transient Procedures; these procedures will be reviewed every two years. However, if a nonroutine procedure is fully exercised and there is a detailed scrutiny of the entire procedure as part of a documented training program, this may serve as the biennial review of the procedure used.

At least every two years, the Quality Assurance (or other independent) organization shall audit a representative sample of routine plant procedures that are used more frequently than every two years. The audit is to ensure the acceptability of the procedures and verify that the procedure review/assessment and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.