



VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET
RUTLAND, VERMONT 05701

B.3.2.1
WVY 79-98

REPLY TO:
ENGINEERING OFFICE
TURNPIKE ROAD
WESTBORO, MASSACHUSETTS 01581
TELEPHONE 617-366-9011

September 10, 1979

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Office of Nuclear Reactor Regulation
Thomas A. Ippolito, Chief
Operating Reactors Branch No. 3
Division of Operating Reactors

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) VYNPC letter (WVY 78-86) dated September 7, 1978 from
D. E. Moody to T. A. Ippolito, Subject: Fire Protection
Administrative Controls
(c) VYNPC letter (WVY 78-93) dated October 13, 1978 from
D. E. Moody to T. A. Ippolito, Subject: Fire Brigade
Drill Schedule

Dear Sir:

Subject: Submittal of Additional Information on Fire Protection Administra-
tive Controls

During several recent telephone conversations, your staff asked for additional information and clarification on several subjects in the area of Administrative Controls. The information follows here.

1. Fire Drills

Vermont Yankee has committed to maintain a trained Fire Brigade of at least five men on site at all times. This brigade will consist of the Shift Supervisor as leader (See Item 4), two Auxillary Operators as Primary Fire Fighters and two Security Force Members as Support Personnel.

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In discussing the subject of Fire Drills and how many drills would be sufficient, a program of two drills per man per year was suggested by the NRC Staff as a satisfactory level of training. Vermont Yankee agrees that a two drill per man per year schedule represents a valid program for the level of protection desired, but due to the radical differences in the shift schedule for Security and Operations Personnel, it would be impossible to guarantee that 100% of all Fire Brigade Members would participate in two drills each year. Vermont Yankee does feel that 100% of the Primary Fire Fighting Team (SS and 2 AO's) can be given a drill two times a year but that is impractical for all Support Personnel to participate in two drills each year. Since the Support Personnel will be performing simple duties which will vary insignificantly with different fires, it is not necessary for Support Personnel to participate in the same drill program as the Primary Fire Fighting Team. Therefore, Vermont Yankee proposes the following Drill Program:

- a. Sufficient Fire Drills will be held to provide two drills (at least one on a backshift) for each member of the Primary Fire Fighting Team (Shift Supervisors and Auxillary Operators) each year. This applies to Personnel working in the job on January 1 each year. Personnel hired after January 1 will be drilled as the situation allows.
- b. Any Support Personnel, (Security Guards) not otherwise occupied (a minimum of two) will participate in any drill held while he/she is on shift.
- c. Response to an actual fire may be considered a drill for those involved.

2. Fire Retardant Wood

Vermont Yankee has established controls on the use of wood in areas of high combustible loading and in areas where a significant fire hazard exists and the occurrence of a fire would present a serious threat to the safe shutdown of the Plant (Fire Control Areas). When wood is brought into these areas, it will be:

- a. Fire retardant or,
- b. Painted with a fire retardant coating, or
- c. Wrapped in fire retardant material

3. Pre-Fire Strategies

Vermont Yankee will develop and utilize pre-fire strategies as described in our letter of August 14, 1979.

4. Fire Brigade Leader

Vermont Yankee has assigned the Shift Supervisor as the on-scene Fire Brigade Leader. Included in the normal shift complement are two persons, the Shift Supervisor and the Supervision Control Room Operator, each of whom possess a NRC Senior Reactor Operators License. Both men are equally qualified in all aspects of normal and emergency plant operation.

The Supervisory Control Room Operator normally spends his entire shift in the Control Room and performs most of the plant manipulations which are performed from the Control Room. In the absence of the Shift Supervisor, this individual is authorized by position and license to respond to all normal and emergency conditions. While the Shift Supervisor spends a majority of his time in the Control Room, he makes a thorough tour throughout the Plant once each shift and is frequently outside the Control Room to investigate any abnormal condition. Recognizing that the Supervisory Control Room Operator and Shift Supervisor are equally knowledgeable, it is Vermont Yankee's opinion that during a fire the Shift Supervisor is the man most familiar with plant layout and present conditions by virtue of his day-to-day routine and is the most desirable person to direct the fire brigade.

We trust that the above information responds to your concerns. If you have any further questions, please contact us.

Yours very truly,

YANKEE ATOMIC ELECTRIC COMPANY



D. E. Moody
Manager of Operations

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