



VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET

RUTLAND, VERMONT 05701

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REPLY TO: FVY 81-101

ENGINEERING OFFICE

1671 WORCESTER ROAD  
FRAMINGHAM, MASSACHUSETTS 01701  
TELEPHONE 617-872-8100

July 2, 1981

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

Attention: Mr. Darrell G. Eisenhut, Director  
Division of Licensing

Subject: INPO Plant Specific Evaluation Reports

Dear Mr. Eisenhut:

Your letter of June 4, 1981 to all plants (Generic letter No. 81-23) requested that plant specific evaluation reports issued by the Institute of Nuclear Power Operations (INPO) be placed on our Docket. This request appears to establish a precedent that seems to have substantial, unattractive aspects for us.

INPO Audit Reports, like many other detailed reports by outside consultants, are provided to utility management for their own internal use. We, as do most utilities, frequently use specialized consultants to appraise a particular aspect of our business with the goal of identifying improvements. Generally, these reports contain recommendations that management evaluates in concert with internal information to formulate or revise policy. Since consultants are expert in their field, their recommendations are given much credence, but are seldom implemented without careful adjustment. Putting detailed reports of this nature on the Docket and in the Public Document Room seems to accomplish nothing other than potentially reduce management prerogative regarding implementation. This precedent, therefore, is not one that we wish to establish.

Additionally, it is not clear that providing INPO Evaluation Reports to the staff would enhance staff knowledge of any licensee beyond what is currently available. This is primarily true because of the NRC's own Performance Appraisal Branch (PAB) audits which are essentially duplicative of the INPO efforts, and in the recent past, have seemed to approximate the INPO audit schedule fairly closely. If there were no PAB audits, one might argue that some additional information might be contained in INPO evaluations over what is available to the staff. But since there are, at present, it would seem that all information developed by the PAB audits would be generally available within the NRC.



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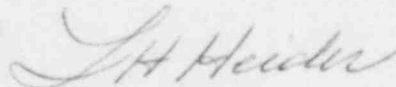
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For all of the foregoing and unless circumstances change such that INPO audits are recognized in lieu of PAB audits, we cannot commit to submitting detailed INPO audit reports on our Docket. Should you have any questions, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

A handwritten signature in cursive script, appearing to read "L. H. Heider".

L. H. Heider  
Vice President