



# VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET

RUTLAND, VERMONT 05701

2.C.2.1

FVY 81-110

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD

FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-1100

August 5, 1981

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

Attention: Office of Nuclear Reactor Regulation  
Mr. D. C. Eisenhut, Director  
Division of Licensing



- References:
- (a) License No. DPR-28 (Docket No. 50-271)
  - (b) Letter, USNRC to All Licensees of Operating Plants, dated October 31, 1980
  - (c) Letter, VYNPC to USNRC, WYV 80-166, dated December 1, 1980
  - (d) Letter, VYNPC to USNRC, FVY 81-69, dated April 17, 1981
  - (e) Letter, USNRC to VYNPC, dated June 30, 1981
  - (f) Letter, USNRC to VYNPC, dated July 10, 1981

Subject: Response to NRC Confirmatory Order dated July 10, 1981

Dear Sir:

We have reviewed the subject Order and have noted several apparent contradictions between the Order and previous communications with the NRC and within the Order itself. The purpose of this letter is to:

1. present our understanding of the Order,
2. point out some of the contradictions presented by the Order, and
3. present Vermont Yankee's proposed actions regarding the Order.

It is Vermont Yankee's understanding that commitments regarding items in the Attachment to the Order which were made in previous correspondence and which have not been specifically refuted by the NRC are acceptable. In these cases the dates indicated by the Order are superseded by the previous commitments.

In the case of one item, II.K.3.27 "Common Reference for Water Level Instruments," the date indicated by the Order is incorrect; Reference (b) required implementation of this item by July 1, 1981, for operating plants, not January 1, 1981 as stated in the attachment to the Order. Regarding this item, Vermont Yankee submitted the required information in Reference (c), and in Reference (d) proposed to implement the required modifications during the refueling outage scheduled to begin during October of 1981. The NRC acknowledged our proposal via Reference (e), stating that they would be amenable to discussing the implementation schedule for this item when they had completed their review of Reference (c). Vermont Yankee believes that it is the NRC's intent to follow the specific approach outlined in Reference (e)

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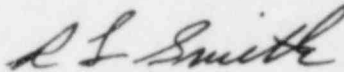
concerning item II.K.3.27, and that the generic requirements of the Confirmatory Order do not take precedence over the previous communication. In any event, Vermont Yankee would not be able to install the required modification until Reference (c) has been approved by the NRC.

It is Vermont Yankee's intent to comply with the subject Order as it applies to our facility in view of previous correspondence. The information contained in the preceding paragraph describes how we believe it applies to Vermont Yankee. With respect to Item II.K.3.27, we propose to proceed in accordance with the information presented in References (d) and (e).

We trust this information is acceptable; however, should you have any questions, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION



R. L. Smith  
Licensing Engineer

RLS/kab