



VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET

RUTLAND, VERMONT 05701

2.C.2.1

FVY 81-140

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD

FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-8100

September 21, 1981

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

Attention: Office of Nuclear Reactor Regulation
Mr. T. A. Ippolito, Chief
Operating Reactors Branch #2
Division of Licensing



References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, USNRC to VYNPC, dated February 18, 1981
(c) Letter, VYNPC to USNRC, FVY 81-65, dated April 14, 1981
(d) Letter, VYNPC to USNRC, FVY 81-68, dated April 16, 1981
(e) Letter, USNRC to VYNPC, dated July 21, 1981

Subject: Shift Staffing

Dear Sir:

We were recently very surprised to receive an NRC letter (Reference (e)) which again tries to impose the requirements of NUREG-0654 regarding minimum shift staffing at Vermont. We had been certain that our position on this issue had been definitively conveyed via References (c) and (d), and was being given the serious consideration warranted in this instance. It seems as though all of our previous efforts in this area were either overlooked or ignored. Vermont Yankee believes that this issue is too crucial to be treated in such a fashion.

We must again stress the fact that we have taken exception to this requirement and have clearly shown the staff that our presently committed shift staffing levels fully address and satisfy all of the functional needs expressed in NUREG-0654. Vermont Yankee has made every effort to demonstrate that our position on this item is not merely theoretical, but is, in fact, based on years of successful operating experience, not only at Vermont Yankee, but at all of the plants within the Yankee organization. We strongly urge that the staff carefully review our prior submittals documenting our position, References (c) and (d), and request that they acknowledge this position.

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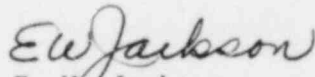
U.S. Nuclear Regulatory Commission
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September 21, 1981
Page 2

The wealth of experience existing in operating nuclear plant management is an invaluable resource which must be utilized to reach an optimal resolution to this concern. To neglect this resource for any reason would be unconscionable, and we are certain that this is not the intention of NRC management. We would be pleased to provide whatever assistance is necessary in this instance, and we will await your reply.

Very truly yours,

VERMONT NUCLEAR POWER CORPORATION

A handwritten signature in cursive script that reads "E. W. Jackson".

E. W. Jackson
Manager of Operations

RLS:dad