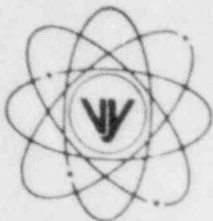


# VERMONT YANKEE NUCLEAR POWER CORPORATION



RD 5, Box 169, Ferry Road, Brattleboro, VT 05301

FVY 82-109  
2.C.2.1

REPLY TO

ENGINEERING OFFICE

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

October 12, 1982

U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation

References: a) License No. DPR-28 (Docket No. 50-271)  
b) USNRC Letter, D. G. Eisenhut to All Licensees  
dated June 15, 1982 (Generic Letter 82-12)  
c) USNRC Letter to VYNPC dated December 15, 1981

Dear Sir:

Subject: Nuclear Power Plant Staff Working Hours

Reference (b) provided the Commission's current policy statement on shift manning requirements including revised working hour guidelines and requested that Vermont Yankee update the administrative section of our technical specifications by October 1, 1982, to assure that our plant administrative procedures following these revised guidelines.

We have established the controls necessary to ensure that, to the extent practicable, personnel are not assigned to shift duties while in a fatigued condition that could significantly reduce their mental alertness or their decision-making ability. Administrative procedures presently in force, implement a management policy which meets the intent of the NRC's revised position in this regard. These procedures have been reviewed by the NRC and found acceptable (Reference (c)). Consequently, we do not believe that a revision to technical specifications is appropriate, since suitable controls have already been imposed and these controls are subject to inspection and enforcement by Region I.

We trust that our position is satisfactory. Please contact us if you require any further information.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

*Warren P. Murphy*  
Warren P. Murphy  
Vice President and  
Manager of Operations

*A001*

WPM/jh

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P PDR