

# VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET

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2.C.2.1

FVY 82-57

REPLY TO:

ENGINEERING OFFICE

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FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-8100

May 21, 1982

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

Attention: Office of Nuclear Reactor Regulation  
Mr. Dominic B. Vassello, Chief  
Operating Reactors Branch #2  
Division of Licensing

References: (a) License No. DPR-28 (Docket No. 50-271)  
(b) Letter, USNRC to VYNPC, dated March 16, 1982

Dear Sir:

Subject: Action Plan Item II.K.3.17, Report on Outages of ECCS,  
Request for Additional Information

Reference (b) requested Vermont Yankee to provide a complete summary of ECCS outages for surveillance testing and preventive maintenance during the five (5) years of operation through 1980. The results are as follows:

## Surveillance

The ECCS and diesel generator systems or subsystems are not normally taken out of service for surveillance testing. The surveillance activities which require these systems or subsystems to be out of service are completed during plant shutdowns when the equipment is not required to be operable except for the following:

1. HPCI & RHR (LPCI) Trip System Logic Functional Tests and Calibrations. These activities require complete system level inoperability during the testing period. Each system is inoperable for eight (8) hours twice a year for a total of 80 hours per system for the five year period. Relief from these testing requirements has been requested (see Proposed Change 80, dated May 18, 1979).

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2. CS & ADS Trip System Logic Functional Tests and Calibrations are also done twice a year. One of two subsystems is removed from service each time. Each subsystem requires 4 hours to complete the tests. Thus, again, 80 hours of system outage time is required for each system for the five year period.

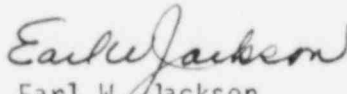
#### Preventive Maintenance

It has not been Vermont Yankee's practice to take systems or subsystems out of service for performance of preventive maintenance during periods when they are required to be operable. Preventive maintenance activities which require these systems or subsystems to be out of service are scheduled for plant shutdowns when the systems or subsystems are not required to be operable.

Appendix A provides the information required for Reference (b) in a tabular format.

We trust this information is responsive to your request; however, should additional data be required, do not hesitate to contact us.

Very truly yours,

  
Earl W. Jackson  
Manager of Operations

EWJ/jh

## APPENDIX A

SURVEILLANCE

SYSTEM	TEST/COMPONENT	DATE OUT/DURATIONS	DATE OUT/DURATIONS	DATE OUT/DURATIONS	DATE OUT/DURATIONS
HPCI	Trip System Logic Functional Tests and Calibrations	2-4-76/4 hrs. 7-24-76/4 hrs.	1-18-77/4 hrs. 7-20-77/4 hrs. 2-3-77/4 hrs.	1-18-78/4 hrs. 7-21-78/4 hrs.	1-17-79/4 hrs. 7-17-79/4 hrs.
HPCI	Isolation Trip System Logic Functional Tests and Calibrations	3-10-76/4 hrs. 9-10-76/4 hrs.	3-9-77/4 hrs. 10-1-77/4 hrs.	3-9-78/4 hrs. 9-6-78/4 hrs.	3-6-79/4 hrs. 9-7-79/4 hrs.
LPCI	Trip System Logic Functional Tests and Calibrations	6-10-76/8 hrs. 12-2-76/8 hrs.	6-8-77/8 hrs. 11-30-77/8 hrs.	6-1-78/8 hrs. 11-30-78/8 hrs.	7-10-79/8 hrs. 11-28-79/8 hrs.
CS	Trip System "A" Logic Functional Test and Calibration	2-19-76/4 hrs. 8-17-76/4 hrs.	2-17-77/4 hrs. 8-18-77/4 hrs.	2-16-78/4 hrs. 8-17-78/4 hrs.	2-15-79/4 hrs. 8-17-79/4 hrs.
CS	Trip System "B" Logic Functional Test and Calibrations	2-19-76/4 hrs. 8-17-76/4 hrs.	2-17-77/4 hrs. 8-18-77/4 hrs.	2-16-78/4 hrs. 8-17-78/4 hrs.	2-15-79/4 hrs. 8-17-79/4 hrs.
ADS	Trip System "A" Logic Functional Test and Calibration	4-14-76/4 hrs. 10-14-76/4 hrs.	4-14-77/4 hrs. 10-11-77/4 hrs.	4-11-78/4 hrs. 10-16-78/4 hrs.	4-11-79/4 hrs. 11-8-79/4 hrs.
ADS	Trip System "B" Logic Functional Test and Calibration	4-14-76/4 hrs. 10-14-76/4 hrs.	4-14-77/4 hrs. 10-11-77/4 hrs.	4-11-78/4 hrs. 10-16-78/4 hrs.	4-11-79/4 hrs. 11-8-79/4 hrs.

PREVENTIVE MAINTENANCE

None

IONS DATE OUT/DURATION

.	1-16-80/4 hrs.
.	7-15-80/4 hrs.
	3-4-80/4 hrs.
	9-24-80/4 hrs.
.	5-28-80/8 hrs.
s.	12-7-80/8 hrs.
.	2-14-80/4 hrs.
.	8-13-80/4 hrs.
.	2-14-80/4 hrs.
.	8-13-80/4 hrs.
.	3-26-80/4 hrs.
.	10-15-80/4 hrs.
.	4-8-80/4 hrs.
.	10-15-80/4 hrs.

Alternate Testing

Tech. Specs. require the ADS Logic Tests to be done prior to taking the HPCI system out of service for maintenance when it is required to be operable. These are the only ECC system logic tests required for alternate testing. Outage dates correspond to HPCI system outage dates addressed in our original submittal.

Date Out/Duration

5-12-76/8 hours

6-17-76/8 hours

10-12-76/8 hours

2-9-77/8 hours

11-8-77/8 hours

4-25-78/8 hours

3-26-80/8 hours