



VERMONT YANKEE NUCLEAR POWER CORPORATION

SEVENTY SEVEN GROVE STREET

RUTLAND, VERMONT 05701

REPLY TO:

ENGINEERING OFFICE

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TELEPHONE 617-872-8100

June 17, 1982

FVY 82-73

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

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

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, Ropes & Gray to USNRC, dated June 9, 1982
(c) Letter, USNRC to Ropes & Gray, dated May 13, 1982
(d) Letter, VYNPC to USNRC, FVY 82-40, dated April 9, 1982
(e) Letter, USNRC to Ropes & Gray, dated March 23, 1982

Subject: Interim Requirements Related to Hydrogen Control

Dear Sir:

Reference (e) informed our legal counsel that our request for an interpretation of 10CFR50.44 [Reference (d)], had been transferred from the General Counsel to the Office of the Executive Legal Director (OELD), for an informal opinion. OELD's opinion, provided via Reference (c), states that Vermont Yankee must comply with the requirements of 10CFR 50.44(c)(3)(ii).

The purpose of this letter is to inform you that we, as did our legal counsel via Reference (b), respectively disagree with OELD's opinion. Independent of the effort discussed above, Vermont Yankee is presently participating with the BWR Owners Group Hydrogen Control Committee, in response to the latest requirement for hydrogen recombiner capability. Our future licensing actions in this area will be predicated on our review of the results of their study.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

J. B. Sinclair
J. B. Sinclair
Licensing Engineer

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