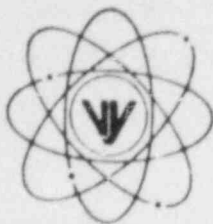


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

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REPLY TO:

ENGINEERING OFFICE

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

August 12, 1983

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

Attention: Office of Nuclear Reactor Regulation
Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing

References: a) License No. DPR-28 (Docket No. 50-271)
b) Letter, VYNPC to USNRC, FVY 83-30, dated April 19, 1983
c) Letter, VYNPC to USNRC, FVY 83-83, dated August 4, 1983

Dear Sir:

Subject: NUREG 0737, Supplement I - Additional Information

By References b) and c), we provided you with our integrated plan and schedule for addressing the concerns detailed in NUREG 0737, Supplement I, Requirements for Emergency Response Capability. Since this time, we have had discussions with Mr. V. Rooney of your staff concerning our specific plans for Safety Parameters Display System (SPDS) capability at our facility. These discussions have resulted in a request by Mr. Rooney that we provide you with additional information as to the basis for our conclusion that the determination of the need for, and scope of, a SPDS cannot be accomplished until the completion of certain other NUREG 0737, Supplement I activities.

As stated in Section 3.1 of NUREG 0737, Supplement I, "In some cases, a good SPDS may obviate the need for large-scale Control Room modifications. Installation of SPDS should not be delayed by slower progress on other initiatives, and should not be contingent on completion of the Control Room Design Review." We agree that a "good" SPDS may obviate the need for certain Control Room design modifications. However, we respectfully disagree with the contention that the implementation of a SPDS should not be delayed by other activities.

As discussed in References b) and c), the basis for a SPDS should reflect the results of an assessment of Regulatory Guide 1.97 variables; 2) the development of plant-specific Emergency Operating Procedures (EOP's); and 3) the completion of a major portion of our Control Room Design Review (CRDR). Two of these activities, namely the Regulatory Guide 1.97 assessment and the Control

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Room Design Review, are designed to insure that the best data that can be available is available to assist Control Room operators in preventing and mitigating abnormal occurrences. The resultant product from the CRDR and Regulatory Guide 1.97 efforts will be an integrated list of changes that should be made to the Control Room. Until these two activities are complete, the development of a SPDS will be premature in that it will not necessarily reflect the best possible SPDS design from a plant-specific perspective. That notwithstanding, one must also consider the problems associated with backfitting an existing SPDS with the changes necessitated by the CRDR and Regulatory Guide 1.97 developed inputs.

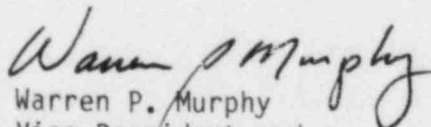
In summary, we view the SPDS as a mechanism for addressing the findings of these other activities, so that the overall combination of Control Room design modifications best reflects our plant-specific needs. Clearly, the definition of what constitutes a "good" SPDS must be viewed from the perspective of how the SPDS is integrated into the overall Control Room design. To design a SPDS without benefit of the essential information would be contrary to good human-factors principals and thus may exacerbate the problem it is intended to solve.

Based on this overall integrated approach, the information we believe is necessary to determine the scope of a SPDS will not be available until the last quarter of 1984. At that time, we will develop our Safety Analysis Report which will document the basis for our SPDS. Our present schedule calls for the report to be complete by February 1, 1985, at which time we will submit it to the NRC along with our specific plans for the subsequent development and implementation of a SPDS.

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

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Warren P. Murphy
Vice President and
Manager of Operations