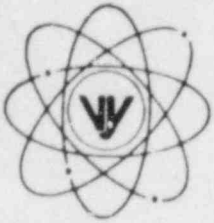


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

2.C.2.1
FVY 83-92

REPLY TO:

ENGINEERING OFFICE

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

August 16, 1983

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

Attention: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, VYNPC to USNRC, FVY 81-117, dated July 31, 1981
(c) Letter, USNRC to VYNPC, SER for Appendix R to 10 CFR 50, dated January 13, 1983
(d) Letter, USNRC to VYNPC, Amendment No. 43 to Facility Operating License No. DPR-28, dated January 13, 1978
(e) Letter, VYNPC to USNRC, WVY 77-8, dated January 31, 1977

Subject: Request for Exemption - Appendix R to 10 CFR 50

Dear Sir:

By Reference (b), we submitted our proposed design for an Alternate Safe Shutdown System at our facility. This proposal was subsequently reviewed and approved by the NRC as documented in Reference (c). We have recently completed a final design audit of this system during which we identified an additional area which requires a formal exemption from the requirements of Appendix R to 10 CFR Part 50.

The Northwest Corner Room, located at elevation 232' above the RCIC Pump Room, does not meet the separation requirements of Section III.G.2 of Appendix R to 10 CFR Part 50. Specifically, power cables for both safety trains (in conduit) enter the corner room near the ceiling with a separation of approximately three (3) feet. These cables then quickly separate, exiting the corner room with a separation of approximately thirty (30) feet. The cables supply power to the Reactor Recirculation M-G Set, Core Spray pumps; RHR pumps and RHR Service Water pumps. This equipment is all necessary to achieve cold shutdown.

In 1977, we submitted a fire hazards analysis [Reference (e)] which indicated that the combustible loadings in the Northwest Corner Room area are relatively small, and thus determined that fire protection was not necessary. In addition, the corner room, which contains only instrument racks, is provided with smoke detectors and is classified as a vital area which severely restricts access. The NRC subsequently concurred with our determination, as documented in Section 5.7.1 of the staff's fire protection Safety Evaluation Report (SER), Reference (d). The SER also concludes that only three areas of

8308220072 830816
PDR ADOCK 05000271
F PDR

A006
1/0

United States Nuclear Regulatory Commission
Attention: Harold R. Denton, Director

August 16, 1983
Page 2

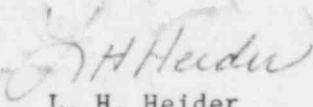
the plant need be provided with Alternate Shutdown capability; the Switchgear Room, the Control Room, and the Cable Spreading Room. However, as a result of the recent audit, it became apparent that a formal exemption request would be necessary to administratively satisfy the provisions of Appendix R despite the fact that the technical issue had been previously dispositioned in our fire hazards analysis.

Based on the above, we hereby request an exemption from the requirements of Section III.G.2 of Appendix R to 10 CFR Part 50 for the Northwest Corner Room. Further, we request that the tolling provisions of 10 CFR Part 50.48(c)(6) be waived in light of our previous submittal [Reference (e)] and the NRC's subsequent concurrence of our determination that the fire loadings in this area of the plant are relatively small.

We trust that our request is acceptable; however, should you require additional information, please contact us.

Very truly yours,

VERMONT RANGEE NUCLEAR POWER CORPORATION


L. H. Heider
Vice President

JBS/bal