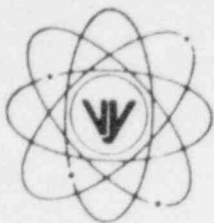


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-39

REPLY TO:

ENGINEERING OFFICE

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

May 1, 1984

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, USNRC to Licensees, dated June 15, 1982
c) Letter, USNRC to Licensees, dated March 7, 1983
d) Letter, VYNPC to USNRC, dated October 12, 1982

Dear Sir:

Subject: Shift Staffing

During the normal review cycle for plant procedure AP 0036, "Shift Staffing", a comment was made by one of the reviewers regarding the application of the procedure and its degree of compliance with NRC guidelines. It was recognized that similar comments might be raised by the NRC. To limit confusion, this letter is being sent to explicitly restate our position with regard to the subject NUREG 0737 item.

At the present time procedure AP 0036 "Shift Staffing" applies the NUREG 0737 overtime restrictions only to the following shift positions and/or individuals: Shift Supervisor, Supervisory Control Room Operator, Control Room Operator, Auxiliary Operator, Shift Engineers, Health Physics Technicians, and Security Officers. During extended periods at cold shutdown conditions, the overtime limits are applied only to those individuals assigned duty in the Control Room. In addition, guidance is provided for management notification should the minimum shift staffing requirements not be met. At no time was our intent to infer that AP 0036 applied to any other position not listed above.

In our response to Generic Letter 82-12, we informed the NRC that it was our position that the administrative procedures in effect, including AP 0036, when combined with proper management supervisory attention for the positions not covered in AP 0036, implemented a policy which met the intent of the NRC's guidelines regarding the restriction of overtime.

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May 1, 1984

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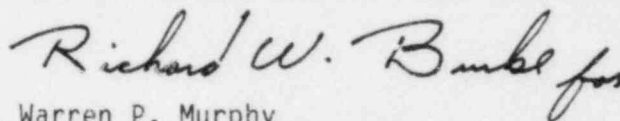
VERMONT YANKEE NUCLEAR POWER CORPORATION

It should be noted that our procedure has been subject to inspection by NRC regional inspectors and deemed acceptable.

We trust that this letter clarifies our position; should you have any questions, please do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

A handwritten signature in dark ink, appearing to read "Richard W. Bunker" followed by a flourish, likely representing Warren P. Murphy.

Warren P. Murphy
Vice President and
Manager of Operations

WPM/dm