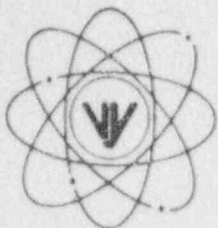


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO
ENGINEERING OFFICE
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BOLTON, MA 01740
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June 16, 1995
BVY 95-66

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, USNRC to VYNPC, USNRC Inspection Report 95-05, NVC 95-61, dated 4/7/95

Subject: Summary of Self Assessment of Vermont Yankee's Verification and Validation Process of Emergency Operating Procedures

As discussed in your Inspection Report [Reference (b)], we have recently completed a self-assessment of the review process utilized with a recent revision of the Emergency Operating Procedures. A summary of this assessment is provided in this letter and the full report is available for your review at our facility.

Background:

As part of an effort to improve our Emergency Operating Procedures (EOPs), the draft procedures were subjected to the Verification and Validation (V&V) processes as required for EOPs per the Procedure Generation Program (PGP). Following operator training and exercising of the draft EOPs in the simulator environment, additional enhancements as well as errors were identified. Further, as indicated in Reference (b), your inspection of our use of the draft procedures in the simulator identified that, although the proposed changes to the EOPs were in general an improvement, the number of implementation errors suggested that an examination into the adequacy of the Verification and Validation processes was warranted.

Discussion:

As noted in your inspection report, Vermont Yankee performed a self-assessment of the EOP Validation and Verification processes. The assessment identified a general weakness in our administrative process for EOP revisions. The principal areas for improvement included applying the V&V processes to all phases of development of the EOP revision, fully implementing the procedure writing recommendations of NUREG 0899, enhancing training in V&V methods for the principal reviewers, extending the scope of the verification process to encompass review of changes to the technical justification documents, improving controls for changes to support procedures and improving the guidance for an appropriate technical justification for deviations between EPGs/PSTGs and PSTGs/OEs.

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Corrective Actions:

The following is a summary of corrective actions that Vermont Yankee will pursue to address our self-assessment findings. All of the actions will be resolved by February 1996 or prior to any further EOP revisions.

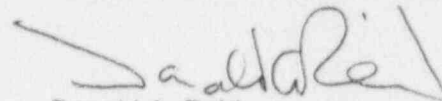
- 1) The PGP will be revised to require a final review using V&V methods. This will ensure EOPs are written in accordance with the OE Writers Guide and that the PSTG, including the justifications, are technically correct and complete.
- 2) Controls will be provided for maintenance of support procedures. This will prevent changes to operator actions relied upon for proper implementation of the PSTG.
- 3) The OE and support procedure writers guides will be revised to ensure the recommendations of NUREG 0899 relative to procedure writing are appropriately addressed.
- 4) The scope of the verification process will be revised to add a verification that the justification documents accurately reflect the revisions to the PSTGs and the EOPs.
- 5) The PGP will be revised to include a description of the qualifications required for the lead individuals involved in the development of revisions to the EOPs and supporting documentation.
- 6) The PGP verification process and the engineering support training program will be revised to clarify the expectations for an appropriate technical justification.

We believe that resolution of the corrective actions identified by our self-assessment will strengthen our overall V&V processes and prevent future, similar weaknesses.

If you have any questions or require additional information, please do not hesitate to call us.

Sincerely,

Vermont Yankee Nuclear Power Corporation



Donald A. Reid
Vice President, Operations

cc: USNRC Region I Administrator
USNRC Resident Inspector - VYNPS
USNRC Project Manager - VYNPS