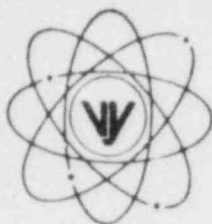


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

2.C.2.1
FVY 84-15

REPLY TO:

ENGINEERING OFFICE

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

March 2, 1984

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Thomas T. Martin, Director
Division of Engineering and
Technical Programs

References: (a) License No. DPR-28 (Docket No. 50/271)
(b) Letter, USNRC to VYNPC, dated January 31, 1984 and
Inspection Report No. 83-33, Appendix A (Notice of Violation)

Dear Sir:

Subject: Response to Inspection Report 83-33

This letter is written in response to Reference (b), which indicates that one of our activities was not conducted in full compliance with Nuclear Regulatory Commission requirements. This alleged Level V violation was identified as a result of an inspection conducted by your Mr. H. Bicehouse during the period December 6-9, 1983.

Information is submitted as follows in answer to the alleged violation contained in the Appendix to your letter.

Item: Technical Specification 6.5B requires, in part, that radiation control procedures be prepared, approved and maintained and made available to all station personnel. These procedures shall be consistent with 10 CFR Part 20, and reviewed and approved by the Plant Manager, or his designee, and the Manager of Operations.

Contrary to the above, radiation control procedures, necessary to comply with 10 CFR Part 20, for the van-mounted personnel whole body counting system were not reviewed and approved by the Plant Manager, or his designee, and the Manager of Operations. The system was used without the required procedures from September 7, 1983 through December 9, 1983.

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PDR ADCK 05000271
Q PDR

VERMONT YANKEE NUCLEAR POWER CORPORATION

Response: The body burden counting performed with Yankee Atomic Electric Company's (YAEC) van-mounted system cited in the Notice of Violation was believed to be acceptable under the existing procedures.

Vermont Yankee Procedure OP 0533, "Body Burden Counting," contains the statements: "Body Burden Counting, using the in vivo gamma spectroscopy system installed at VY, will be the primary means of bioassay. In special cases, and at the discretion of the Plant Health Physicist, other types of analysis may be performed." This procedure has been approved by both the Plant Manager and the Manager of Operations and is available to all VY personnel.

Prior to the performance of any body burden counting with the system mentioned in the Notice of Violation, the Plant Health Physicist reviewed Yankee Atomic Electric Company's approved procedure (YAEC No. 530) for operating the system.

Once the Plant Health Physicist determined that YAEC Procedure No. 530 met the requirements of OP 0533, a Service Request was transmitted to Yankee Atomic (dated 8/17/83). This Service Request asked for the counting system to be brought on-site for operation by VY personnel, "after they received instruction."

Documented training in the requirements of YAEC No. 530 was completed before VY personnel were permitted to use the system. In addition, a review was performed by the Plant Health Physicist to confirm the adequacy of the training.

Vermont Yankee Procedure OP 0533, "Body Burden Counting," will be revised as necessary prior to the future use of any equipment not already addressed in OP 0533. A review of applicable Technical Specifications is under consideration to determine whether revision is appropriate to further avoid violations of this nature.

We trust that this information will be satisfactory; however, should you have any questions or desire additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

for Richard W. Burke

Warren P. Murphy
Vice President and
Manager of Operations