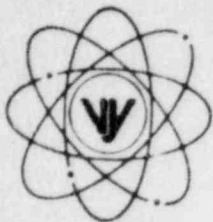


VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-90

REPLY TO:
ENGINEERING OFFICE

167 1/2 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

July 19, 1984

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 84-34, dated April 11, 1984
(c) Letter, VYNPC to USNRC, FVY 84-74, dated June 29, 1984
(d) Letter, VYNPC to USNRC, FVY 84-81, dated July 10, 1984
(e) Letter, VYNPC to USNRC, FVY 84-61, dated June 12, 1984
(f) Letter, USNRC to VYNPC, NRY 83-192, dated August 19, 1983
(g) Letter, VYNPC to USNRC, Proposed Change No. 121 to
Facility Operating License No. DPR-28, dated June 26, 1984

Subject: Additional Requests for Scheduler Extensions for Environmental
Qualification of Certain Electrical Components at Vermont Yankee

Dear Sir:

In accordance with the provisions of 10CFR59.49(g), Vermont Yankee Nuclear Power Corporation hereby requests scheduler extensions for certain electrical components required to be environmentally qualified, in accordance with the provisions of 10CFR59.49, prior to startup from our present refueling outage. A list of these components is provided in Enclosure 1 to this letter.

For each component listed in Enclosure 1, we have included a reference to a Justification of Continued Operation. In some cases, the associated JCO was submitted to you as Enclosure 7 to the Vermont Yankee Upgraded Environmental Qualification Program, which was forwarded by letter, dated April 11, 1984, [Reference (b)]. Necessary additional component JCO's are provided in Enclosure 2 to this letter.

The basis for scheduler relief, as well as the schedule for resolving these deficiencies, is discussed in Enclosure 1. We trust that this information, coupled with the associated Justifications for Continued Operation, provide an adequate basis for your approval of our scheduler extension requests. Because your review and approval of our requests is required prior to restart from our present refueling outage (which is now scheduled for August 2, 1984), we request your expedited review and approval of these requests.

The components listed in Enclosure 1 are in addition to those submitted to you by letter dated, July 10, 1984 [Reference (d)]. At this time, all of the scheduler extension requests contained in Reference (d) are still necessary.

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PDR ADOCK 05000271
F PDR

FOA's

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

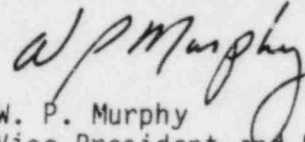
July 19, 1984
Page 2

Since our Environmental Qualification Program validation/verification effort is still in progress, it is possible that additional schedular extensions will be necessary. It is our present intent to provide you with a list of these items, if necessary, no later than July 27, 1984. At that time, we will also inform you if any of our existing component schedular extension requests are no longer necessary.

We trust that our requests are deemed acceptable; however, should you have any questions regarding this matter, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

A handwritten signature in dark ink, appearing to read "W. P. Murphy". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

W. P. Murphy
Vice President and Manager of Operations

Enclosures

VERMONT YANKEE NUCLEAR POWER CORPORATION

SCHEDULAR EXTENSION REQUESTS FOR
ENVIRONMENTAL QUALIFICATION OF CERTAIN ELECTRICAL COMPONENTS

1) Local Power Range Monitors (LPRMs)

The LPRMs provide neutron flux post-accident monitoring information to verify the reactor is shut down. Reactor shutdown will be verified very shortly after scram signals are generated.

Due to a lack of qualification information, we have not been able to document the environmental qualification of the LPRMs.

We intend to investigate this problem further under our Regulatory Guide 1.97 Assessment Program, being implemented in response to NUREG-0737, Supplement 1. As stated in our letter, dated June 12, 1984 [Reference (e)], the results of our program, as well as a schedule for implementing any necessary component modifications, will be submitted to the NRC in October 1984.

We will inform you of our planned resolution and schedule for completion of this issue in future correspondence relative to Regulatory Guide 1.97.

In the interim, Justification for Continued Operation (JCO) Number 39 in Enclosure 7 to Reference (b) ensures that Vermont Yankee can be safely operated until the completion of our Regulatory Guide 1.97 Assessment Program.

2) Control Rod Position Indication

The Control Rod Position Indication Probes and associated components provide information to verify a reactor scram. Reactor scram will be verified very shortly after scram signals are generated.

Due to a lack of qualification information, we have not been able to document the environmental qualification of this equipment.

We intend to investigate this problem further under our Regulatory Guide 1.97 Assessment Program, consistent with the schedule discussed in Reference (e).

We will inform you of our planned resolution and schedule for completion of this issue in future correspondence relative to Regulatory Guide 1.97.

In the interim, Justification for Continued Operation (JCO) Number 29 in Enclosure 7 to Reference (b) ensures that Vermont Yankee can be safely operated until the completion of our Regulatory Guide 1.97 Assessment Program.

3) MOV 10-32

This component is the inboard motor-operated isolation valve on the Residual Heat Removal (RHR) Head Spray line. The Head Spray line has been permanently disconnected from the reactor vessel and is blanked off with a blind flange inside the dry well.

Because of this modification, MOV 10-32 is no longer required to be leak rate tested in accordance with 10CFR Part 50, Appendix J, and is not within the scope of our EQ Program since it is no longer relied upon for primary containment isolation. As described in Section 3.2 of the NRC's Appendix J Safety Evaluation Report (SER), dated August 19, 1983 [Reference (f)], Type C testing is not required for lines forming a closed, seismically-qualified loop, with a water seal, within the Reactor Building.

MOV 10-32 leak rate testing requirements have been deleted from our current Appendix J Leak Rate Testing Program. This program was submitted to the NRC for approval by letter, dated June 26, 1984 [Reference (g)], and is currently under review. Pending the NRC's approval of our determination that MOV 10-32 no longer requires leak rate testing, Justification for Continued Operation Number 43 in Enclosure 7 to Reference (b) ensures that Vermont Yankee can be safely operated in the interim period.

4) MOV-10-13B and MOV 10-39A

These motor-operated valves are part of the Residual Heat Removal (RHR) System. During our field verification walkdowns performed during this outage, the serial numbers on the valves were discovered to be different than what our EQ records indicated.

The manufacturer is being contacted to determine the qualification status of these components.

Justification for Continued Operation Numbers 68 and 69 in Enclosure 2 provide assurance that Vermont Yankee can be safely operated until the qualification documentation effort is complete.

We request a schedular extension for qualification of these components until our 1985 refueling outage, which is scheduled to commence in early September 1985.

VERMONT YANKEE
ENVIRONMENTAL QUALIFICATION
JUSTIFICATIONS FOR CONTINUED OPERATION (JCOs)
SUPPLEMENT NO. 1
DATED: JULY 19, 1984

SUPPLEMENT 1

JCO INDEX

COMPONENT/SERVICE

JCO NO.

Residual Heat Removal System

MOV 10-13B

68

MOV 10-39A

69

VERMONT YANKEE
JUSTIFICATION FOR CONTINUED OPERATION

COMPONENT: MOTOR-OPERATED VALVE
SYSTEM: RHR
MANUFACTURER: Limitorque
MODEL:
LOCATION: Reactor Building (Volume 32)
FUNCTION: "B" RHR Pump Suction From Torus
SERVICE: MOV 10-13B

QUALIFICATION DISCREPANCY:

Lack of documentation on motor.

JUSTIFICATION FOR CONTINUED OPERATION:

This valve is normally open and during an accident it would remain in the open position. Failure of the motor will not cause the valve to close.

Although for long-term LOCA flexibility, it may be desirable to operate this valve, all essential accident safety functions are normally performed with this valve open.

This valve services the "B" RHR pump of the "B" RHR Subsystem. A qualified "D" RHR pump, which operates in parallel with the "B" pump, is available.

Therefore, justification for the continued safe operation of the plant is demonstrated.

VERMONT YANKEE
JUSTIFICATION FOR CONTINUED OPERATION

COMPONENT: MOTOR-OPERATED VALVE
SYSTEM: RHR
MANUFACTURER: Limitorque
MODEL:
LOCATION: Reactor Building (Volume 46)
FUNCTION: "A" RHR Torus Cooling and Spray Outboard Isolation
SERVICE: MOV 10-39A

QUALIFICATION DISCREPANCY:

Lack of documentation.

JUSTIFICATION FOR CONTINUED OPERATION:

This valve is normally closed and is required to open shortly after an accident for Torus Cooling and spray functions.

It is likely that Torus Cooling will be initiated within ten (10) minutes after an accident in which blowdown to the Torus is involved. The environmental stress received by this valve within the first ten (10) minutes of an accident should not prevent it from opening.

If this valve fails to operate properly during an accident, the redundant, qualified "B"-RHR Torus Cooling Subsystem is also available.

Therefore, justification for the continued safe operation of the plant is demonstrated.