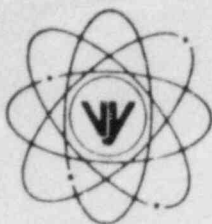


# VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-49

REPLY TO

ENGINEERING OFFICE

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

May 21, 1984

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Mr. 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 84-24, dated 3/14/84  
c) Letter, USNRC to VYNPC, Inspection Report 50-271/83-26,  
dated 11/2/83

Dear Sir:

Subject: Request for Exemption - 10CFR Part 50, Appendix R, Fire  
Protection Program for Nuclear Power Facilities Operating  
Prior to January 1, 1979

In accordance with the provisions of 10CFR Part 50.12, Vermont Yankee Nuclear Power Corporation hereby requests the enclosed exemption from the requirements of 10CFR Part 50, Appendix R, Section III.G, Fire Protection of Safe Shutdown Capability.

As discussed in Reference b), this exemption request results from our ongoing resurvey of our Reactor Building initiated in response to I&E Inspection Report 50-271/83-26 (Reference c). As of this date, our resurvey is continuing and may result in the need for additional exemption requests or the need to supplement the existing requests.

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VERMONT YANKEE NUCLEAR POWER CORPORATION

We trust that the enclosed exemption request is deemed acceptable; however, should you have any questions regarding this matter, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

*Richard W. Burke*

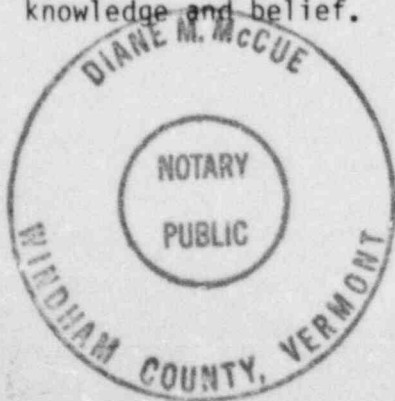
Richard W. Burke  
Operations Support Manager

WPM/dm

cc: U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406  
Attn: Dr. Thomas E. Murley

STATE OF VERMONT )  
WINDHAM COUNTY ) ss

Then personally appeared before me, Richard W. Burke, who, being duly sworn, did state that he is Operations Support Manager of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing document in the name and on the behalf of Vermont Yankee Nuclear Power Corporation and that the statements therein are true to the best of his knowledge and belief.



*Diane M. McCue*  
Diane M. McCue Notary Public  
My Commission Expires February 10, 1987

VERMONT YANKEE EXEMPTION REQUEST FROM

10CFR PART 50, APPENDIX R

Steam Tunnel

Vermont Yankee requests exemption from the provisions of Section III.G.2.b for the steam tunnel. Specifically, exemption is requested from the requirement to have redundant trains of equipment separated by a horizontal distance of 20 feet with no intervening fire hazards or combustibles, with fire detection and an automatic suppression system installed in the area.

The technical basis for this exemption request is as follows:

This area contains the steam lines to the High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) Systems. An all-encompassing fire could disable these steam lines by closing the RCIC and HPCI Motor Operated Valves. If this were to happen, safe shutdown is provided and achieved by using an SRV and one of two core spray pumps or any one of four RHR pumps as a reactor makeup source.

The tunnel is an enclosed concrete room with a steel entrance door and access panel. There is high temperature detection, set for 212°F, whose purpose is to detect steam leaks. This would also quickly detect any fire.

Due to the congested space, high temperature and high radiation during operation, no combustibles could be stored here.

We believe that the public health and safety is protected in a fashion equivalent to that resulting from compliance with the technical requirements of Section III.G.2.b of Appendix R to have detection and automatic suppression installed between redundant trains of equipment separated by a horizontal distance of 20 feet with no intervening combustibles or fire hazards. Therefore, we request an exemption from the requirements of III.G.2.b for the Steam Tunnel.