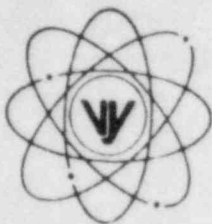


# VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-52

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: Office of Nuclear Reactor Regulation  
Mr. D.G. Eisenhut, Director  
Division of Licensing

References: a) License No. DPR-28 (Docket No. 50/271)  
b) Letter, VYNPC to USNRC, FVY 81-117, dated 7/31/81  
c) Letter, USNRC to VYNPC, Fire Protection Safety Evaluation Report, dated 1/13/78  
d) Letter, VYNPC to USNRC, FVY 82-72, dated 6/16/82  
e) Letter, VYNPC to USNRC, FVY 82-119, dated 11/12/82  
f) Letter, VYNPC to USNRC, NRY 83-05, dated 1/13/83  
g) Letter, USNRC to VYNPC, Inspection Report No. 50-271/83-26, dated 11/2/83

Dear Sir:

Subject: Request for Scheduler Extension - Vermont Yankee  
Alternate Shutdown Capability

In accordance with the provisions of 10CFR50.12, Vermont Yankee Nuclear Power Corporation hereby requests an extension from the scheduler provisions of 10CFR50.48, "Fire Protection". Specifically, we are requesting scheduler relief from 50.48(c) with respect to the installation of our Alternate Safe Shutdown System. In accordance with the provisions of 50.48(c), this system is due to be installed and operational prior to startup from our 1984 refueling outage. This outage is scheduled to commence June 16, 1984 and end in August 1984.

The basis for our scheduler extension request is as follows. By letter dated July 31, 1981 (Reference b), we provided the NRC with the design details of our proposed Alternate Shutdown System for the Control Room, Cable Vault, and Switchgear Room. The scope of our Alternate Shutdown System was based, in part, on the results of the NRC Fire Protection Safety Evaluation Report (SER), dated January 13, 1978 (Reference c), which identified the Control Room, Cable Vault, and Switchgear Room as specific areas of concern. Supplemental design information was provided by letters, dated June 16, 1982 (Reference d) and November 12, 1982 (Reference e). Our proposed design was subsequently reviewed and approved by the NRC as documented in the Safety Evaluation Report, dated January 13, 1983 (Reference f).

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VERMONT YANKEE NUCLEAR POWER CORPORATION

The design of our existing Alternate Shutdown System does not include the assumption of a random loss of off-site power as part of the design basis. Our interpretation of both the proposed and final versions of 10CFR Part 50, Appendix R, "Fire Protection Program for Nuclear Power Facilities", indicated that we need only consider a loss of off-site power for those scenarios where a specific fire could directly cause the loss of off-site power. We were subsequently informed during a Region I audit of our compliance to Appendix R, detailed in Inspection Report 83-26 (Reference g), that the intent of Appendix R is to assume a random loss of off-site power. As a result of subsequent discussions with members of your staff and our participation at a recent Appendix R Region I workshop (held to clarify the criteria of Appendix R), we have decided to accept the NRC's position with respect to assuming random loss of off-site power.

Our acceptance of this assumption results in the need to perform a more detailed engineering review of associated circuits to ensure that such circuits will not prevent operation or cause maloperation of redundant trains of systems necessary for safe shutdown. This effort, scheduled to be complete in August 1984, may result in identifying particular areas within the Reactor Building that do not meet the specific technical requirements of III.G.2 and result in the need to modify our existing Alternate Shutdown System. Upon completion of the associated circuits study, it is our intent to submit our plans and schedules for assuring subsequent compliance with Appendix R, as necessary.

In the interim, for those areas presently identified, or areas discovered during the performance of the engineering review of associated circuits, which do not meet the applicable criteria of 10CFR Part 50, Appendix R and for which improved fire protection features and/or modifications are to be implemented, Vermont Yankee will institute the following compensatory measures:

- 1) The Fire Brigade Commanders (Shift Engineers) will be cognizant of those plant areas for which improved fire protection features and/or modifications are to be implemented. The Shift Engineers will be directed to be particularly sensitive when issuing fire permits in these areas to minimize the potential fire hazard.
- 2) The Plant Fire Protection Coordinator or his alternate will tour the subject areas three times per week to determine if any unnecessary fire hazards or combustibles exist. Any situations so identified will be promptly corrected.
- 3) Vermont Yankee will implement these interim measures commencing May 23, 1984.

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We believe that the above compensatory measures provide adequate assurance that Vermont Yankee can be safely operated without undue risk to the health and safety of the public pending the completion of the associated circuits study and the installation of any necessary design modifications. In addition, the NRC Inspection Team concurred by Reference g) that, based on the fire protection modifications made since 1978 and the inherent train separation in the Reactor Building, the safety significance of not strictly complying with the staff's interpretation of the need to assume random loss of off-site power is minimized.

The existing Alternate Shutdown System design, approved in the NRC SER dated January 13, 1983 (Reference f), is scheduled to be installed and operational prior to startup from the 1984 refueling outage in accordance with the scheduler provisions of 10CFR50.48(c). As discussed above, a schedule for any necessary modifications to this system will be dependent on the results of the associated circuits study.

We trust that the above information provides an adequate basis for granting our scheduler extension request; however, should you have any questions regarding this matter, please contact us. Your prompt attention to this matter will be greatly appreciated.

Very truly yours,

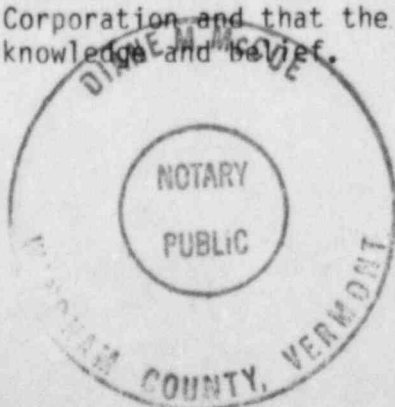
VERMONT YANKEE NUCLEAR POWER CORPORATION

*Richard W. Burke*

Richard W. Burke  
Operations Support Manager

WPM/dm  
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