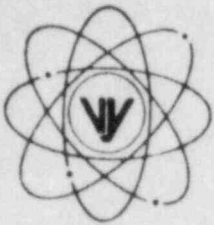


# VERMONT YANKEE NUCLEAR POWER CORPORATION



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

FVY 84-120

REPLY TO:

ENGINEERING OFFICE

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

October 5, 1984

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

Attention: Office of Nuclear Reactor Regulation  
Mr. Domenic B. Vassallo, Chief  
Operating Reactors Branch No. 2  
Division of Licensing

References:

- a) License No. DPR-28 (Docket No. 50-271)
- b) Letter, USNRC to All Operating Reactors, Generic Letter 83-28, dated 7/8/83
- c) Letter, VYNPC to USNRC, FVY 83-117, dated 11/7/83
- d) "BWR" Scram System Reliability Analysis", W.P. Sullivan, et al, dated 9/30/76 (transmitted in letter from GE to NRC, "General Electric Company ATWS Reliability Report," dated 9/30/76)
- e) Letter, VYNPC to USNRC, Proposed Change No. 79 to Facility Operating License DPR-28, dated 3/17/80
- f) Letter, USNRC to VYNPC, Amendment No. 58 to Facility Operating License DPR-28, dated 11/3/80
- g) Letter, VYNPC to USNRC, dated 3/23/84

Dear Sir:

Subject: Generic Letter 83-28, Generic Implications of Salem ATWS Events

By Reference g), we stated that we would inform you of our plans and schedule for completion of our Equipment Classification Enhancement Program. The purpose of this letter is to submit to you that information.

As discussed in Reference c), Vermont Yankee classifies structures, components, and systems in accordance with ANS-22, Draft No. 4, Revision 1, May 1973, "Nuclear Safety Criteria for the Design of Stationary Boiling Water Reactor Plants", as stated in the NRC-Approved Yankee Atomic Electric Company Operational Quality Assurance Manual (YOOAP-1-A). Three separate documents presently comprise the "Information Handling System" used to identify safety-related components. These are Appendix C of YOOAP-1-A (Classification of Structures, Components, and Systems), Safety Class Drawings (System Flow Diagrams and Electrical 1-Line Diagrams) and the I-E Instrument List.

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VERMONT YANKEE NUCLEAR POWER CORPORATION

After an overall review of our Equipment Classification Program, we have determined that our "Information Handling System" used to identify safety-related components should be improved. Plans for enhancement to this system and to our overall classification program are outlined below:

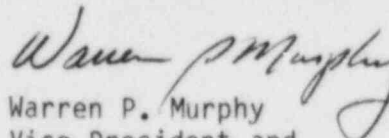
1. A formal procedure will be written to provide guidelines for making a determination of component safety classification.
2. A single list of all safety-related equipment down to the component level will be created (Master Equipment List).
3. Using the procedure developed in Item 1, we will determine the safety classification of all components on the Master Equipment List. The Reactor Trip Function System components will be classified first to adhere to Reference g) commitments.
4. Controls will be established such that the Master Equipment List will be maintained and controlled.
  - a. The requirements for format, content and sorting capabilities will be established.
  - b. Procedures for preparation, validation, and routine utilization of the Master Equipment List will be developed.
  - c. The routine utilization procedure will be incorporated into the Personnel Training Program.
5. The existing Plant-Specific Lists will remain in place under existing controls until the Master Equipment List is developed and approved.

This Enhancement Program will require an extensive allocation of engineering resources for its development and completion. Since this effort will have to be integrated with ongoing engineering activities, it is estimated that completion will be accomplished by December 1986.

We trust that this information satisfactorily addresses your concerns; however, should you have any questions, please do not hesitate to contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION



Warren P. Murphy  
Vice President and  
Manager of Operations

WPM/dm